Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-160



June 20, 2016

Evaluation Team Report - RENEWAL OF ACCREDITATION VISIT REPORT

ID for Campus Visited: 00024422

Main Campus ID: 000024422

Staff Contact: Ms. Cathy Kouko - Phone: (202) 336-6790

Application ID:65754

VISIT RESPONSE DUE DATE: June 30, 2016

Dr. Leon E. Linton President SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090 acics@solex.edu

Dear Dr. Linton:

A copy of the report prepared by the Council's evaluation team that recently visited your institution is attached. The Council invites you to respond to this report in two ways before it takes formal action on your institution's application for accreditation. First, please e-mail Mr. Ian Harazduk at backnowledge that you have received and read the report and include any comments about the report or the visit. Second, please submit your response to the findings in the report via your online application. The Council offers the institution ten days to formally respond to the report; therefore, your response should be uploaded by the date indicated above.

We look forward to receiving your response. You will be notified in writing of the Council's decision following its next meeting.

Visit Response

Your response should pertain to the findings notated in the report or letter. The following information provides suggestions for developing your response. Please include information on any significant changes that have taken place at the institution since the site visit.

Web-Based Submission of Campus Response

ACICS has implemented a web-based submission process for all visit responses. The response to each finding must be uploaded under the application ID number associated with the visit (this is noted on the cover page of the team report). Each finding must include a narrative and supporting documentation (if applicable). If supporting documentation covers more than one finding, the campus is required to duplicate the documentation and upload it in each finding. Submission of a current catalog need only be uploaded once and only if referenced in the response. If you have any questions, please send your inquiry to Ian

Harazduk at (b)(6) @acics.org.

Process:

Once the campus logs on to the ACICS membership website, go to the "In Process Applications" heading, select the application name and ID. The campus will then click either "Citation Documents" and upload each response document as described below. (Please see the attached "Preparing the Institutional Response" for step-by-step visual instructions on how to upload your response into your institution's Member Center Account.)

IMPORTANT: Document Labels

The institution may name the document any appropriate file name. However, each document must be labeled with the corresponding 'Document Type.'

Example: the document type submitted to satisfy response:

Finding 1 Narrative task must be labeled Narrative 1.

If a campus needs to submit multiple pieces of information to support one citation response, this information should be combined into one document prior to uploading. Note: The capacity size for each upload task is 100MB, if this combined document exceeds this limit, then the campus may separate the document and upload each of these documents separately with different file names, as long they are labeled with the correct "Document Type."

Response Tasks

Below is the format for how the listing of "Document Type" will appear once the document is uploaded. Each visit type will have a standard amount of visit *Response* tasks. Upload your response document and label each one accordingly. Ignore tasks that exceed your response requirement.

Narrative 1
Supporting Document 1
Narrative 2
Supporting Document 2
Narrative 3
Supporting Document 3
Narrative 4
Supporting Document 4

Responses should be professional in appearance. The responses should be paginated and well-organized to ensure a complete and sufficient review.

Sincerely,

(b)(6)

Linda J. Lundberg Accreditation Content Editor Accreditation and Institutional Development

Enclosures



RENEWAL OF ACCREDITATION VISIT REPORT

SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090 ACICS ID Campus Code: 00024422

Dr. Leon E. Linton, President (b)(6) @solex.edu)
(acics@solex.edu)

LEARNING SITE WABASH LEARNING SITE 180 N. Wabash Ave. Chicago, IL 60601 Learning Site Code: 00267203

May 11-12, 2016

Dr. Scot Ober	Chair	Words etc, Inc.	Tucson, AZ
Ms. Joyce Strout	Student-Relations Specialist	J. B. Strout & Co.	Lincoln, NE
Mr. Timothy Peterson	Educational Activities Specialist/ Data Integrity Reviewer	Brown College	Minneapolis, MN
Dr. Shannon Groff	Intensive English Specialist	Florida State College	Jacksonville, FL
Ms. Cathy Kouko	Staff Representative	ACICS	Washington, DC

PROGRAMS OFFERED BY SOLEX COLLEGE WHEELING, IL

						Rete	CAI ntion & Pl		⁄o)
CREDENTIAL					Enroll; Full-	2015		2014	
EARNED (As defined by the institution)	ACICS CREDENTIAL	APPROVED PROGRAM TITLE	Contact Hrs.	Semester Credit Hrs.	time/ Part- time	Ret.	Pla.	Ret.	Pla,
Certificate	Certificate	Intensive English Program* · +#	648	31.5	300/0	76	N/A	79	N/A
Associate's	Occupational Associate's	Accounting**	1076	60	0	93	N/A	78	N/A
Certificate	Certificate	Computerized Accounting and Bookkeeping**	560	30	0	100	N/A	100	N/A
Associate's	Occupational Associate's	Physical Therapist Assistant*+***	1847	75	21/15	85	89	75	71
Certificate	Certificate	Medical Assistant**	720	38	0	78	63	76	60
Certificate	Certificate	Basic Nursing Assistant**	120	5	0	69	88	96	79
Certificate	Certificate	Information Technology Career**	525	30	0	100	75	100	N/A
Associate's	Occupational Associate's	e-Business Management**	1047	63	0	N/A	N/A	N/A	N/A
		TOTAL ENROLL	MENT		336				
CAMPUS RETENTION %		89	CAMPUS PLACEMEN		NT %			83	

^{*}The intensive English and physical therapist assistant programs are the only programs for which the college currently has enrollment and is running.

- + The physical therapist assistant program is taught 100 percent at the Wabash learning site.
- + The intensive English program is taught at the main campus and learning site locations.

#This is based on the basic certificate. There are 73.5 credits available as program electives across the program.

^{**}The college has put these programs on hiatus as it evaluates their effectiveness and decides whether to keep them or change them. The campus has taught out the certificate program in basic nursing assistant.

^{***}Program not reviewed because of specialized accreditation. The physical therapist assistant program has specialized accreditation with the Commission on Accreditation in Physical Therapy Education (CAPTE), which expires in 2019.

INTRODUCTION

SOLEX College programs are designed to educate students for technical or occupational careers or to enhance preexisting vocational knowledge. The campus launched operations in 1995 and has been continuously accredited by ACICS since 2009. SOLEX is a shortened form of "Solution Expert," a program of study formerly offered by the campus.

Although the campus is approved to offer 10 certificate and occupational associate's degree programs, only 2 programs currently have students enrolled—the certificate in intensive English(IEP) and the occupational associate's degree program in physical therapist assistant (PTA). The PTA program is programmatically accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE) and this accreditation expires in 2019. Thus, the only program that was evaluated by the team was the certificate in intensive English program.

At the completion of the IEP, the campus awards a certificate of completion rather than an academic credential. The ACICS approval letter lists this as a "certificate" program, without identifying it as a nonacademic credential. The program has no vocational objectives and the campus provided no placement data for the program.

Throughout its visit, the team was frustrated in securing needed documentation from the campus; often the documentation was either initially missing or contained conflicting information. With effort, the team was able to secure all needed information and documentation in order to complete its report.

The student population is primarily international, currently representing 53 countries. Students enter with widely varying competence in the English language and are tested and placed in an appropriate level of instruction.

The campus had an all-time high enrollment of 1,300 students in 2008. Enrollment has declined because many sponsoring countries no longer offer scholarships for international study, many Mideast countries are no longer sponsoring these students, and the geopolitical situation internationally is, according to the campus president, not as conducive for international studies as it has been in the past.

DATA INTEGRITY REVIEW SUMMARY

			Team	Team	Team
	Reported	the second secon			Confirmed
Program	Placed	Unavailable	to call	Calls	Placement
OA degree in physical therapist assistant	8	1	8	7	7
Certificate in information technology career	6	0	6	1	1
Certificate in medical assistant	5	O	5	4	3
Certificate in basic nursing assistant	7	0	6	3	3
Totals	26	1	25	15	14

REPORT QUESTIONS

1. MISSION

1,01	Give the page number in the campus catalog on which the mission statement can be found. The mission is found on page 5 of the campus's 2016 catalog.
1.02	Does the campus have an appropriate mission statement with a set of supporting objectives? Yes No
1.03	Are the objectives devoted substantially to career-related education? Yes No Not Applicable
1.04	Are the objectives reasonable for the following: (a) The programs of instruction? \[\subseteq \text{Yes} \text{No} \] (b) The modes of delivery? \[\subseteq \text{Yes} \text{No} \] (c) The facilities of the campus? \[\subseteq \text{Yes} \text{No} \]
1.05	Are the mission statement and supporting objectives appropriately disclosed in the campus catalog and in other publications that are readily available and understandable to the public? Yes No
1.06	Is the campus committed to successful implementation of its mission? ☑ Yes ☐ No
CAM	PUS EFFECTIVENESS
1.07	Does the campus have a current Campus Effectiveness Plan (CEP)? ∑ Yes □ No
1.08	If the campus is a branch, does the branch have its own CEP, separate from the main campus IEP? Yes No Not Applicable
1.09	Does the CEP describe the following: (a) The characteristics of the programs offered? ☐ Yes ☐ No (b) The characteristics of the student population? ☐ Yes ☐ No (c) The types of data that will be used for assessment? ☐ Yes ☐ No (d) Specific goals to improve the educational processes? ☐ Yes ☐ No (e) Expected outcomes of the plans?

	∑ Yes □ No
1.10	Are the following five required elements evaluated in the CEP? (a) Student retention. Yes No No Not Applicable (new branch only) (c) Level of graduate satisfaction. Yes No Not Applicable (new branch only) (d) Level of employer satisfaction. Yes No Not Applicable (new branch only) (e) Student learning outcomes. Yes No
	If No for any applicable item, insert the section number in parentheses and explain: (Section 3-1-111): The CEP does not meet Council requirements. It contains no current data on the leve of graduate and employer satisfaction, and student learning outcomes are not appropriate for the programs.
1.11	Define the measurable student learning outcomes used by the campus and how these outcomes are being assessed. (Section 3-1-111): According to the CEP, the campus measures student learning outcomes by analyzing cumulative grade point average in addition to the supplemental data source of final course grades and SAP. However, the actual assessment of these outcomes is not included. Further, licensure pass rates in the physical therapist assistant (PTA) program are not mentioned a measurable outcome when it is the most critical.
1.12	Are the following identified and described in the CEP? (a) The baseline data for each outcome. Yes No Not Applicable (b) The data used by the campus to assess each outcome. Yes No Not Applicable (c) How the data was collected. Yes No Not Applicable (d) An analysis and summary of the data collected and an explanation of how the data will be used to improve the educational processes. Yes No Not Applicable
	If No for any applicable item, insert the section number in parentheses and explain: (Section 3-1-111): As stated in 1.10 above, the CEP does not contain a discussion of the levels of graduate and employer satisfaction. Additionally, student learning outcomes for the IEP certificate

(Section 3-1-111): As stated in 1.10 above, the CEP does not contain a discussion of the levels of graduate and employer satisfaction. Additionally, student learning outcomes for the IEP certificate program are determined to be the when students must demonstrate mastery of a level before enrolling in a more advanced level, but the evaluation does not address the requirements. Further, licensure pass rates in the PTA program are not mentioned at all as a critical indicator of learning.

1.13	Has the campus published annual placement and retention goals in its CEP that demonstrate its ability to maintain or improve retention and placement outcomes? Yes No
	If No, insert the section number in parentheses and explain: (Section 3-1-111): Retention goals were not published in the CEP. While the plan included a summary of its performance against the ACICS benchmark on page 11 of its plan, specific goals were not set.
1.14	Has the campus published specific activities that will be undertaken to meet placement and retention goals? Yes No Not Applicable
	If No, insert the section number in parentheses and explain: (Section 3-1-111): Since retention goals were not set, there were no specific activities outlined to be undertaken. Rather, a summary of actions already taken was discussed. The CEP did include specific activities to meet its placement goals at the campus and program levels.
1.15	Describe the specific activities that the campus will undertake to meet these goals. The campus has recently stopped accepting students into many programs because of low enrollments. The campus has increased its community-involvement efforts, including field trips and guest speakers, in order to provide the IEP students a broader opportunity to refine their English skills. Overall, the campus has a retention rate of 89 percent, high above the ACICS benchmark of 70 percent.
1.16	Does the campus have documentation to show the following: (a) That the CEP has been implemented? ☐ Yes ☐ No (b) That specific activities listed in the plan have been completed? ☐ Yes ☐ No (c) That periodic progress reports have been completed? ☐ Yes ☐ No
1.17	Who is responsible for implementing and monitoring the CEP? Describe this individual's qualifications. If a committee is utilized, please describe the committee. Dr. Leon Linton, campus president and owner, is responsible for implementing and monitoring the CEP. He holds an Ed.D. degree in organizational leadership from Argosy University, an MBA degree from the Keller Graduate School of Management, and a master's degree in radio frequency engineering from the Minsk Engineering Institute. He started the institution in September 1995.
1.18	Does the campus have documentation to show that the CEP is evaluated at least annually? Yes No Not Applicable (new branch or initial applicant only)
2. OF	RGANIZATION
2.01	Is the following information regarding the campus appropriately stated in the catalog? (a) Governance, control, and corporate organization. Yes No (b) Names of the trustees, directors, and/or officers.

	∑ Yes ☐ No
	(c) Names of the administrators.
	∑ Yes
2.02	Does the campus:
	(a) Adequately train its employees?
	∑ Yes
	(b) Provide them with constant and proper supervision?
	⊠ Yes No
	(c) Evaluate their work?
	Yes No
2.03	Is the administration of the campus efficient and effective?
	⊠ Yes □ No
2.04	Does the campus maintain written documentation to show that faculty and staff members:
	(a) Clearly understand their duties and responsibilities?
	∑ Yes □ No
	(b) Know the person to whom they report?
	∑ Yes ☐ No
	(c) Understand the standards by which the success of their work is measured?
	⊠ Yes □ No
2.05	Does the administration maintain documentation of the evaluation of the faculty and staff?
	∑ Yes □ No
2.06	Has the campus adopted a policy on academic freedom that has been communicated to the faculty?
	∑ Yes □ No
2.07	Does the campus have an appropriate grievance policy for faculty and staff?
	⊠ Yes □ No
2.08	Does the campus catalog or the student handbook contain an appropriate grievance policy for students
	that includes the name and address of ACICS?
	Yes No Not Applicable (initial applicants only)
2.09	Who is responsible for the financial oversight of the campus, and what are this person's qualifications?
	Dr. Leon Linton, campus president and owner, is responsible for the financial oversight of the campus.
	As noted earlier, he holds an Ed.D. degree in organizational leadership from Argosy University, an
	MBA degree from the Keller Graduate School of Management, and a master's degree in radio frequency
	engineering from the Minsk Engineering Institute.

3. ADMINISTRATION

3.01 Is there evidence that the chief on-site administrator(s) or the self-study coordinator for the campus attended an accreditation workshop within 18 months prior to the final submission of the self-study?

	∑ Yes □ No
2	Are all staff well trained to carry out administrative functions?
	Who is the on-site administrator, and what are this person's qualifications? Dr. Linton, campus president and owner, is the on-site administrator. As noted earlier, he holds degree in organizational leadership, business, and radio frequency engineering.
	Does the campus list degrees of staff members in the catalog? ☑ Yes ☐ No
	If Yes, is appropriate evidence of the degrees on file? ☑ Yes ☐ No
	Is there evidence that the campus keeps adequate records to support the following administrative operations? (a) Financial aid activities. Yes No Not Applicable (campus does not participate in financial aid) (b) Admissions.
	 Yes ☐ No (c) Curriculum. Yes ☐ No (d) Accreditation and licensure. Yes ☐ No (e) Guidance.
	Yes No (f) Instructional resources. Yes No (g) Supplies and equipment.
	 Yes □ No (h) The school plant. Yes □ No (i) Faculty and staff. Yes □ No
	(j) Student activities. Yes
	If No for any applicable item, insert the section number in parentheses and explain: (Section 3-1-303(a)): The campus does not maintain adequate records as it relates to student financial accounts.

3.11	Do student files contain evidence of graduation from high school or the equivalent? Yes No
3.12	Are appropriate transcripts maintained for all students? ☐ Yes ☐ No
	If No, insert the section number in parentheses, list student names, and explain: (Section 3-1-303(e)): The transcript for the certificate for the intensive English program does not identify the credential earned.
3.13	Is the grading system fully explained on the transcript, and is it consistent with the grading system that appears in the campus catalog? Yes No
3.14	Are student records protected from theft, fire, water damage, or other possible loss? Yes No
3.15	Does the campus maintain transcripts for all students indefinitely? ☑ Yes ☐ No
3.16	Does the campus maintain admissions data and other records for at least five years from the last date of attendance for all students? Yes No
4. RE	CLATIONS WITH STUDENTS
FOR	ALL PROGRAMS
4.01	How many student files were reviewed during the evaluation? A total of 58 student files were requested and reviewed by the team. This included 50 active students, 2 dropped students, 2 students not making satisfactory academic progress, 2 students who received transfe of credit, and 2 Return to Title IV Funding (R2T4) files. Files were requested representing active and graduated students from the intensive English program and the physical therapist assistant program.
4.02	Does the campus ensure that its student relations reflect high ethical standards? ∑ Yes □ No
4.03	Does the campus have appropriate admissions criteria? Yes No
4.04	Does the campus contract with third parties for admissions and recruiting purposes? ☐ Yes ☐ No
	If Yes, are these parties supervised by and familiar with the campus?

Yes Yes

No No

	(Section 3-1-410): The institution contracts with third parties for recruiting purposes, yet does not ensure the supervision of these agencies or confirm their familiarity with the campus.
	Through the interview process, the team learned that SOLEX College has a contract with several agencies in other countries who market information and provide leads to the institution. The admissions representative will contact the student directly after the lead is documented and received. These agencies are paid on a commission basis for their leads.
	On day two of the campus visit, however, the team received a letter from the president of SOLEX College, Mr. Linton, stating the following, "I, Leon E. Linton, President of SOLEX College, hereby certify that our organization does not utilize any marketing agencies located outside the United States of America for any purposes." In a follow-up discussion with Mr. Linton, he stated that these 100+ agencies distributed printed materials, met with students, assisted the institution in the admissions process by sending prospective student names to SOLEX College, and received a paid commission for their services. He stated, however, that this was "not marketing/recruiting." The team disagreed.
05	Is there evidence to document that admissions criteria are applied consistently to all students admitted under the same version of the admissions criteria (e.g., that students admitted into specific programs for the same start date are admitted under the same admissions criteria)? Yes No
06	Does the admissions policy conform to the campus's mission? ☐ Yes ☐ No
07	Is the admissions policy publicly stated? ☑ Yes ☐ No
08	Is the admissions policy administered as written? ☑ Yes ☐ No
09	Does the campus use an enrollment agreement for each enrolled student that: (a) Clearly outlines the financial obligations of both the institution and the student? ☐ Yes ☐ No (b) Outlines all program-related tuition and fees? ☐ Yes ☐ No (c) Has a signature of the student and the appropriate school representative? ☐ Yes ☐ No
	Is there evidence that a copy of the agreement has been provided to the student? ☐ Yes ☐ No

4.10 Who is responsible for the oversight of student recruitment at the campus and what are this person's qualifications?

Mr. John Ferrante is the admissions manager responsible for the career programs. Mr. Ferrante was out of the office during the visit, so Mr. David McGuire, director of operations, was interviewed by the team regarding admissions processes. Mr. McGuire holds a bachelor's degree in photography from Bradley University and an associate's degree in applied science from Lincoln College. Ms. Titiana Hamilton is responsible for all international student admissions. She holds a master's degree in engineering from Volgograd Engineering Institute in Ukraine. Ms. Hamilton is a Designated School Official (DSO) on campus and director of international students, as well as being vice president of the college.

4.11 Describe the recruiting process for new students.

The process for recruiting international students is separate from the process used for those domestic students enrolling in career programs. Once a lead is received from the agency or the student directly online, the international admissions representative will contact the student with information necessary for application. International students are only admitted for the intensive English program (IEP). A checklist is given to the student listing all steps necessary for a completed application. Students must supply bank statements, sponsor letters, affidavit of support forms, passport, and personal income tax returns. Students must pay a \$150 application fee. All documents must then be in place, with signed forms being presented to their admissions contact. The DSO will issue the I-20 forms for the students. There are four DSOs on campus, all supervised by Ms. Tatiana Hamilton. Students then receive an acceptance letter, an I-20 form, and housing, program, and campus information. After all application forms are received, the student will go to the U.S. Embassy for their U.S. visa. They are provided with a step-by-step flyer advising them of all information that needs to be completed. Housing information is also provided. A special intensive English placement exam is given to all students. Orientation is then scheduled as a group, with individuals meeting with counselors to assist them with bank accounts, community environment, and to check that the enrollment agreement is completed correctly. The campus DSO representative will review their payment requirements.

With the career-program process, domestic students are interviewed on the phone, using a student questionnaire (both adult and high school). They are given a time for a personal appointment on campus. Ms. Cynthia Farris, senior admissions representative, will also meet students off campus for interviews and to review the enrollment packet and the application fee. Students are given a PowerPoint presentation regarding the campus programs. Students who are judged to be a good fit for the institution are presented an application form to complete. All students take the Wonderlic test, with results being held on campus by Ms. Sharon McNeely, the compliance officer. Students pay an application fee and are given a receipt by the admissions representative; this receipt is taken to the financial aid department for recording. Payments are accepted by the front-desk receptionist for cash, check, or credit card. After the appropriate application forms are received, then the student will go to the group orientation scheduled prior to the start of the term.

Based on inte	erviews, observations, and a review of recruitment materials, is the process compatible with
the education	nal objectives for the campus?
⊠ Yes	□ No

The team learned through admissions interviews (and a review of the CAR presented on-site) that 149 students were enrolled in one or two classes, without enrolling in a program. These "nondegree-seeking

students" were originally counted on the CAR, which identified a uniqueness in the admissions process and caused a thorough, in-depth, and time-consuming review of the CAR. The CAR initially presented in the team room was an earlier worksheet version; the revised CAR presented to ACICS was later provided by the campus to the team and was accurate.

4.12	Are individuals engaged in admissions or recruitment activities communicating current and accurate
	information regarding the following?
	(a) Courses and programs.
	(b) Services.
	Yes No
	(c) Tuition.
	Yes No
	(d) Terms.
	⊠ Yes
	(e) Operating policies.
	⊠ Yes □ No
4.13	Does the campus use prospective student names obtained as a result of a survey, canvass, or promise of future employment or income while a student, or as a result of other marketing activity? Yes No
4.14	Does the state in which the campus operates require representatives to be licensed or registered? ☐ Yes ☐ No
4.15	Are the titles of recruitment and enrollment personnel appropriate? ☑ Yes ☐ No
4.16	Does someone other than recruitment and enrollment personnel make final decisions regarding financial aid eligibility, packaging, awarding, and disbursement?
	Yes No Not Applicable (campus does not participate in financial aid)
	If Yes, who holds this responsibility and what are this person's qualifications?
	Ms. Anahi Huerta, financial aid administrator/revenue officer, is responsible for making decisions
	regarding eligibility, packaging, awarding, and disbursement of student financial aid. Ms. Huerta
	attended Triton College in Illinois, completing one year of postsecondary education. She is currently the
	financial aid administrator at SOLEX College, beginning in March 2016. She was previously employed
	by Computer Systems Institute (CSI) as the director of financial aid at the Chicago campus. She was a
	financial aid advisor at the Career Education Corporation for Sanford Brown Florida campuses. Ms.
	Huerta was an enrollment specialist for Matria Health Care prior to being an accounting assistant at MicroTax in Chicago.
4.17	Are all recruiters supervised by the campus to ensure that their activities are in compliance with all
T, 1 /	applicable standards?
	Yes No
	N 163

Mr. David McGuire is the director of operations responsible for the supervision of the admissions director and the admissions department of three representatives. Mr. McGuire was new to the position. Does the campus have written policies and procedures for evaluating and accepting transfer of credit? 4.18 X Yes No Is there evidence that the campus properly awards transfer of credit? 4.19 X Yes No Not Applicable Does the campus publicize its transfer credit policies, including policies related to accepting transfer credit 4.20 from another campus? X Yes No 4.21 Has the campus established articulation agreements with other institutions? No (Skip to question 4.23 for Master's Degree Programs or 4.24 for all programs) Yes FOR ALL PROGRAMS Is the standards of satisfactory academic progress policy published in the catalog? 4 24 X Yes No If Yes, state the page number(s) where the standards of satisfactory academic progress policy is published. The SAP information listed in the catalog was not printed in one complete SAP section of the catalog when the team arrived for the visit. The revised information is now presented correctly on pages 14-17 of the 2016 SOLEX College revised catalog. 4.25 Does the standards of satisfactory academic progress (SAP) policy published in the catalog contain the following? (a) A definition of the maximum time frame allowed for students to complete a program as 1.5 times the normal program length. X Yes No (b) A schedule that designates the minimum percentage of work that a student must successfully complete at the end of each evaluation increment to complete the program within the maximum time frame. X Yes No (c) Procedures for re-establishing satisfactory academic progress. X Yes (d) A definition of the effects of the following on the CGPA and successful course-completion percentage: Withdrawals. Yes No Incomplete grades. X Yes No Repeated courses. X Yes No Non-punitive grades.

	Yes No Not Applicable (campus does not offer) Non-credit or remedial courses.
	Yes No Not Applicable (campus does not offer)
	A warning status.
	Yes No Not Applicable (campus does not use)
	A probationary period.
	∑ Yes ☐ No
	An appeal process.
	An extended-enrollment status.
	Yes No Not Applicable (campus does not offer)
	The effect when a student changes programs.
	The effect when a student seeks to earn an additional credential.
	Yes No Not Applicable (campus only offers one program)
	The implications of transfer credit.
	⊠ Yes □ No
	If No for any item, insert the section number in parentheses and explain:
	(Section 3-1-421 and Appendix D): The SAP policy does not meet all the expectations of Appendix D. There is no information regarding student "withdrawal from a program" and its effects on GPA and course-completion time frame. The institution addressed students changing programs and students seeking an additional degree in their revised SAP section of the catalog, but not the effect of withdrawing from a program. Similarly the appeals process is also not addressed.
4.26	Does the campus apply its SAP standards consistently to all students? ☐ Yes ☐ No
4.27	Are students who are not making satisfactory academic progress properly notified?
	Yes No Not Applicable (no students are in violation of SAP)
4.28	Is SAP evaluated at the end of each academic year or at 50 percent of the normal program length if the program is one academic year in length or shorter? Yes No
	Since the IEP classes are only one session or one month in length, SAP is evaluated every two weeks of each session.
4.29	Is SAP evaluated at the end of the second academic year and at the end of each subsequent academic year where students must have a minimum CGPA of 2.0 on a scale of 4.0 or its equivalent, or have academic standing consistent with the institution's requirements for graduation?
4.30	Are students who are not making satisfactory academic progress at the end of the second year dismissed or allowed to continue without being eligible for Federal financial aid?
	Yes No Not Applicable (all programs are less than two years)

4.31	Are qualitative and quantitative components evaluated cumulatively for all periods of a student's enrollment? Yes No
4.32	Are students allowed to remain on financial aid while under warning or probation status? Yes No Not Applicable (campus does not participate in financial aid)
	If Yes, is the student informed of this policy? ⊠ Yes □ No
	At the onset of the visit, the institution was not aware as to whether students are allowed to remain on financial aid status while on probation or under warning status. There is now a reference to this policy in the current financial aid section of the revised catalog.
4.33	Are students whose appeals are granted due to mitigating circumstances placed on probation, eligibility for financial aid reinstated, and considered to be making satisfactory academic progress? Yes No Not Applicable (there are no such students)
4.34	Are students who are placed in an extended-enrollment status denied eligibility for federal financial aid (unless there are mitigating circumstances)? Yes No Not Applicable (campus does not have extended enrollment and/or does not participate in financial aid
4.35	Do credits attempted during the extended-enrollment status count toward the 1.5 times of normal program length? Yes No Not Applicable (campus does not have extended enrollment)
4.36	For students who have exceeded one and one-half times the standard time frame and were awarded the original credential, were any additional financial obligations waived? Yes No Not Applicable (there is no such student and/or the campus does not have such a policy)
4.37	Are students required to have a minimum CGPA of 2.0 or its equivalent upon graduation from all programs? ☐ Yes ☐ No
4.38	Who is responsible for the administration of satisfactory academic progress, and what are this person's qualifications? Ms. Luba Sokil is responsible for co-administering SAP for international students. Ms. Sokil holds an associate's, bachelor's, and master's degree in economics from Ukraine University of Banking, Business, and Economics. Ms. Sokil worked for eight years in the banking industry in Ukraine. She began her career in the United States with SOLEX College as an admissions rep, a student advisor, DSO (acting), and registrar for the international department.

Ms. Anahi Huerta, financial aid administrator, also assists with SAP reports. Ms. Huerta attended Triton College in Illinois, completing one year. As previously described, she previously was employed by Computer Systems Institute as the director of financial aid in Chicago, financial aid advisor at Career Education Corporation for Sanford Brown Florida campuses, enrollment specialist for Matria Health Care, and accounting assistant at MicroTax in Chicago office. She is currently at SOLEX College as the financial aid officer.

Dr. Sharon McNeely is responsible for administering SAP for the career program students. She holds a bachelor's and master's degree in rehabilitation education, and a doctoral degree in educational psychology, all from the University of Wisconsin. Ms. McNeely worked her way through the tenured ranks of Northeastern University as a faculty member and program chair of middle education. She worked part-time at a variety of universities including: Argosy, National Louis, North Park, and Loyola. She came to SOLEX College as an instructor in general education for physical therapy and accounting. She consulted with SOLEX on best practices for a short period before coming on board part-time as the compliance and academic affairs officer.

4.39	How does the campus encourage and assist students who are experiencing difficulty in progressing satisfactorily in their programs?
	(Section 3-1-423): Tutoring is only offered if the student can pay for the service and as such, the campus does not encourage or assist students as it should.
1 ,40	Does the campus finance any of the following? (Mark all that apply.) (a) Scholarships.
	(b) Grants.
	(c) Loans.
	(d) The campus does not offer scholarships, grants, and/or loans. (Skip to Question 4.42.)
1.42	Are all similarly circumstanced students who enrolled at the same time and in the same programs charged the same tuition and fees?
	∐ Yes ⊠ No
	If No, insert the section number in parentheses, list student names, and explain:
	(Section 3-1-432 and Appendix C): The institution is not consistent with the application fees and
	tuition charged to students upon enrollment. The team found several students who had no application fe

The team requested documentation regarding waivers for the students listed below. The campus provided a "waiver form" stating "low income" for each student with no rationale, no application form, and no summary posting on their student ledgers.

There is no disclosure in the catalog stating that students can apply for waived tuition and fees or a

rationale explaining the circumstances under which a waiver can be granted.

--\$50 application/\$100 comprehensive program fee was waived for provided stating "low income" without rationale.

--\$50 application/\$100 comprehensive program fee was waived for A waiver form was provided stating "low income" without rationale.

4.43

4.44

showing \$933 in tuition and fees stating "low income" without rationale.
id not pay the \$100 comprehensive fee. A waiver form was provided for \$92.50
waiving tuition and \$50 fee showing "low income" without rationale. The lack of payment for the \$100
fee was not addressed.
\$50 application fee was waived for A waiver form was provided showing \$4,415 was
waived for tuition and \$50 fee without rationale.
\$100 comprehensive fee was waived for
waived for "low income" without rationale.
\$100 comprehensive fee was waived for A waiver form was provided showing \$2,000
was waived for tuition and all fees of \$150 without rationale.
\$50 application fee/\$100 comprehensive fee was waived for without rationale.
did not pay the \$100 comprehensive fee. The file was not presented with documentation
did not pay the \$100 comprehensive fee. The file was not presented with
documentation.
The campus revised their catalog while the team was onsite to state the following: "Students who have lost a job or qualify for low income support can apply for financial assistance throught the Illinois Employment and Training Center (IETC) within their geographic location. Please contact SOLEX to receive information about the IETC closest to you. By visiting the IETC, you may be eligible for employment search assistance, which may include a tuition subsidy."
The campus "Request for Tuition or Registration Fees Waiver" forms are signed only by the president. There is no rationale, no application forms, and no signatures by the student.
None of the student account ledger worksheets in these examples reflect any credits or notations of these waived fees in their postings.
(Example: tuition and fees waiver form on 7-7-14 totaled \$4,415 (which included \$50
application fee and \$4,365 in tuition). However, the student ledger worksheet showed "FEES TOTAL"
tuition (\$5,630) and comprehensive fee (\$100) totaling \$5,730 along with "RECEIVED TOTAL" of
Pell14-W of \$2865 on 1/5/15 and another Pell14-W of \$2865 on 1/5/15, totaling \$5,730. There is no
\$4,415 credit reflected in the postings.
Another example: has a waiver form totaling \$92.50. The AR student ledger worksheet
does not reflect this credit waiver.
Another example: has a waiver form totaling \$933. His student ledger worksheet shows
no reflection of this \$933 waiver.
A
Are tuition and fees clearly stated in the catalog? ☐ Yes ☐ No
If Yes, have students confirmed receiving a copy of the catalog?
∑ Yes
Do the financial records of students clearly show the following?
(a) Charges.
∑ Yes

	(b) Dates for the posting of tuition.				
	∑ Yes □ No				
	(c) Fees.				
	(d) Other charges.				
	⊠ Yes □ No				
	(e) Payments.				
	⊠ Yes				
	(f) Dates of payment.				
	Yes No				
	(g) The balance after each transaction.				
	⊠ Yes □ No				
4.45	Is the effective date listed on announcements of changes in tuition and fees?				
4,43					
	Yes No Not Applicable (campus has not changed tuition or fees)				
4.46	Is the campus's refund policy published in the catalog?				
. 10	Yes No				
4.47	Is the refund policy fair, equitable, and applicable to all students?				
	Yes No				
	Z Tes Tito				
4.48	Is the campus following its stated refund policy?				
1, 10	Yes No				
4.49	Does the campus participate in Title IV financial aid?				
., .,	Yes No (Skip to question 4.57)				
	Tes Tro (Skip to question 4.57)				
4.50	Who is responsible on-site for administering student financial aid, and what are this person's				
	qualifications?				
	Ms. Anahi Huerta, financial aid administrator/revenue officer, is responsible for the on-site				
	administration of student financial aid. As previously stated, Ms. Huerta attended Triton College in				
	Illinois for one year. She is currently the financial aid administrator at SOLEX, beginning in March				
	2016. She previously was employed by Computer Systems Institute as the director of financial aid at th				
	Chicago campus, financial aid advisor at the Career Education Corporation for Sanford Brown Florida				
	campuses, and enrollment specialist for Matria Health Care prior to being an accounting assistant at				
	MicroTax in Chicago.				
4.51	Is the person who determines the amount of student awards not also responsible for disbursing those				
	awards?				
	⊠ Yes □ No				
	NA 163				
4.52	Are final student financial aid award determinations made by administrative individuals who are not				
	responsible for recruitment?				
	⊠ Yes				

4.53	Is the financial aid administrator a member of a state, regional, or national financial aid association and up to date on procedures and changes in the field? Yes No
	At the onset of the visit, the financial aid officer did not belong to any local, regional, or national financial aid association. During the visit, Ms. Huerta was registered to join the Illinois Association of Student Financial Aid Administrators (ILASFAA), with a \$50 payment documented and mailed to the association.
4.54	Describe how the financial aid office stays current with regulation and policy changes in financial aid (include all appropriate memberships in professional organizations held by this individual). Mrs. Huerta reviews all "Information for Financial Aid Professionals" (IFAP) postings and announcements.
4.55	Is there evidence that the financial aid administrator regularly participates in professional awareness activities? Yes No
	If No, insert the section number in parentheses and explain: (Section 3-1-434(c)): The financial aid administrator does not regularly participate in any professional awareness activities. Ms. Huerta stated that she has not yet participated in professional awareness activities since she is new to the position.
4.56	Does the campus have a written policy that accurately reflects the U.S. Department of Education's definition of a credit hour for credit hour programs and/or clock-to-credit hour programs, including conversion ratios? Yes No
4.57	Does the campus provide discounts for cash received in advance of the normal payment schedule? Yes No (Skip to question 4.58.)
4.58	The beginning enrollment on the most current Campus Accountability Report (CAR) is 520. The ending enrollment reported on the previous year's CAR is 520. At the onset of the visit, the campus presented an older version of the CAR showing the beginning and ending enrollment numbers from ending 2014 to beginning 2015 both as 699, which did not match the submitted CAR received by ACICS showing 520. The initial 2015 CAR worksheet draft showed a beginning enrollment of "0" since the columns were not totaled on the worksheet. However, the column (when manually added) totaled 699. The ACICS team verified the submitted CAR report, which showed 520 student enrollment ending in 2014 and 520 beginning in 2015. During the visit, the registrar discovered the most recently revised and resumbitted copy of the CAR information that showed 520 as the ending 2014 and 520 as the beginning enrollment for 2015.
	An issue that caused a great deal of time and review was the fact that the campus listed 149 students as "part time" on the worksheet, with a total of 669 students. By subtracting the 149 part time, enrollment

equaled 520. It was explained to the team that this total of 149 was actually "non-degree seeking

	programs. Thus, the figure of 520 was accurate and submitted formally.
4.59	Was the team able to verify the retention rate for the campus and for each program as reported on the Campus Accountability Report (CAR) last submitted to the Council? ☐ Yes ☐ No ☐ Not Applicable
4.60	Are students who receive financial aid counseled concerning their student loan repayment obligations? Yes No Not Applicable (campus does not participate in financial aid)
4.61	Describe the process the campus utilizes to ensure that students are counseled concerning their student loan repayment obligations. Students are counseled on exit loan repayment obligations via a printed form. An exit workshop is being planned for students who will be graduating in March 2017.
GENI	ERAL COMMENTS:
	Student comments revealed that:
	The students felt the curriculum was not challenging (boring in nature)They would like more guest speakers on campus in order to learn and practice English skillsThey wish that the facility was maintained for more cleanlinessStudents feel that after Level 6, they learned nothing new.
COM	MENDATIONS:
	The team would like to commend Dr. Sharon McNeely for the efforts she extended to prepare for the ACICS visit and would like to extend compliments to Ms. Luba Sokil for her commitment to excellence.
5. ED	UCATIONAL ACTIVITIES
FOR	ALL PROGRAMS
5.01	Are the credentials awarded by the campus in compliance with its accreditation approval and in compliance with applicable state laws? Yes No
	If No, insert the section number in parentheses and explain:
	(Section 3-1-521): The IEP does not award the credential as approved by ACICS. The school gives a
	certificate of completion instead of a certificate, as noted on the approval letter.
5.02	Who is assigned to oversee the educational activities of all programs at the campus, and what are this person's qualifications?
	Dr. Sharon McNeely is the compliance and academic affairs officer at the institution. As previously detailed, she holds a bachelor's and master's degree in rehabilitation education and a doctoral degree in educational psychology all from the University of Wisconsin. Dr. McNeely worked her way through the tenured ranks of Northeastern University as a faculty member and program chair of middle education. She has worked part-time at a variety of universities including Argosy, National Louis, North Park, and Loyola. Dr. McNeely came to SOLEX College as an instructor in general education for physical therapy

and accounting. She consulted with SOLEX on best practices for a short period before coming on board part-time as the compliance and academic affairs officer. Does this person have appropriate academic or experiential qualifications? 5.03 X Yes No Describe how the campus makes provisions for program administrators to have sufficient authority and 5.04 responsibility for the development and administration of the programs. At the time of the team visit, the only programs with enrollment at the college were the IEP and the PTA programs. Ms. Jill Pomerantz is the person assigned to administer the IEP program and works in conjunction with Dr. McNeely in developing and administering the program. Ms. Pomerantz's full-time responsibility is the IEP program and she utilizes the faculty and student suggestions and input for consideration in making any changes. Ms. Claire Davies is the person assigned to administer the PTA program. 5.05 Is the time devoted to the administration of the educational programs sufficient? X Yes No Is there a published policy on the responsibility and authority of faculty in academic governance? 5.06 X Yes No Does the policy, at a minimum, address the role of the faculty in the following areas? (a) Development of the educational program. X Yes No (b) Selection of course materials, instructional equipment and other educational resources. X Yes No (c) Systematic evaluation and revision of the curriculum. X Yes No (d) Assessment of student learning outcomes. X Yes No (e) Planning for institutional effectiveness. X Yes No 5.08 Is there evidence that this policy has been adopted and faculty members are aware of it? X Yes No Does the campus have any programs that require specialized or programmatic accreditation to obtain entrylevel employment or licensure by the state in which the campus is approved? X Yes No (Skip to question 5.10 for renewal of accreditation. Skip to 5.14 for initial grants.) If Yes, does the campus: (a) Carry the programmatic accreditation or is currently in the process of obtaining such accreditation in a timely manner for programs in which it is required by the state in order for students to attain entry-level employment? X Yes Not Applicable (there is no such requirement by the state) No (b) Notify students as to:

	Yes No
	(2) Whether successful completion of a program qualifies a student to receive, apply to take, or take licensure exams in the state where the campus is located?
	Yes No (3) Any other requirements that are generally required for employment?
	Yes No Not Applicable (no other requirements)
FOR	RENEWAL OF ACCREDITATION ONLY
5.10	Does the campus have any programs with current specialized or programmatic accreditation? Yes No (Skip to question 5.14)
5.11	Does the program meet the needs of its students and the requirements of the Council, as shown by student achievement outcomes which meet or exceed the standards for the following areas: (a) Student retention rate of 65 percent (programs >1 year in length) OR 70 percent (programs ≤ 1 in length)? ☐ Yes ☐ No (b) Student placement rate of 70 percent?
	(b) Student placement rate of 70 percent? ☐ Yes ☐ No
5.12	Was the team able to verify the backup documentation to support the placement rate for the program(s) that hold specialized accreditation as reported on the last Campus Accountability Report submitted to the Council? Yes No Not Applicable
	YY
	How many calls to employers or graduates were attempted? A total of 9 calls to graduates or employers were attempted in the occupational associate's degree in PTA.
	How many calls to employers or graduates were successful?
	A total of 7 calls were successful, which included 3 graduates and 4 employers.
	How many of the successful contacts confirmed the employment of the graduate as reported on the CAR? Please explain any discrepancy between the number of successful contacts and confirmations. All 7 successful contacts confirmed employment of the graduate as reported on the most recent CAR.
5.13	Was documentation on file to verify graduates classified on the CAR as "not available for placement"? ⊠ Yes □ No □ Not Applicable
FOR	ALLCAMPUSES
5 1 4 3	Was the team oble to weify the backup decumentation to support the placement rate for the program(s) that
J.14 1	Was the team able to verify the backup documentation to support the placement rate for the program(s) that had placements as reported on the last Campus Accountability Report submitted to the Council but are not being reviewed (no enrollment, discontinued, etc.)? Yes No Not Applicable

in the information technology

How many calls to employers or graduates were attempted?

Information Technology: 6

Medical Assistant: 5

Basic Nursing Assistant: 6

How many calls to employers or graduates were successful?

One call to the graduate in the information technology career program was successful.

One call to a graduate and 2 calls to the employer were successful in the basic nursing program.

One call to the graduate and 3 calls to employers were successful in the medical assistant program

How many of the successful contacts confirmed the employment of the graduate as reported on the CAR? Please explain any discrepancy between the number of successful contacts and confirmations. All successful contacts confirmed the employment of the graduates as reported on the CAR.

If No, insert "Section 3-1-303(a)" in parentheses and explain:

(Section 3-1-303(a)): The team was unable to verify the following employment of the graduates listed below as reported on the most recent CAR provided to the team:

career program were reported on the CAR as working in the field; however, Dr. Sharon McNeely, the compliance officer, reported to the team that these graduates were incorrectly reported as employed in the field when in fact they were not employed in the field. The campus could not provide any further employer information to the team at the time of the visit, and the team was unable to reach any of these graduates. 5.15 Was documentation on file to verify graduates classified on the CAR as "not available for placement"? X Yes No Not Applicable Are the educational programs consistent with the campus's mission and the needs of its students? 5.16 X Yes Do the formation of policies and the design of educational programs involve students, graduates, administrators, faculty, and other interested parties such as advisory committees? X Yes No

5.18 What provisions are made for individual differences among students in the learning environment? At the time of the visit, the only active program at the main campus was the IEP. As previously stated, the PTA program has enrollment at the learning site and is programmatically accredited. It was explained to the team that when students are struggling in one of the courses, they have the opportunity to reach out to the faculty member who would attempt to work with the student and see if they can resolve the learning situation. If they are unable to resolve, the student is then referred to the program director of the IEP, at which time the student will be counseled and assessed through questions and conversation. The program director also shared with the team that tutoring is available to any student who requests it; however, the cost of tutoring is the responsibility of the student.

5.19	Describe the system in place to evaluate, revise, and make changes to the curriculum. Faculty have the opportunity and are encouraged to make suggestions to the IEP program director of any changes or revisions they feel appropriate to the curriculum. The program director works with the compliance and academic affairs officer to evaluate and make any changes they determine are appropriate to enhance the curriculum.
5.20	Does the faculty participate in this process? ☐ Yes ☐ No
5.21	Is credit appropriately converted in relation to total student contact hours in each class? Yes No
5.22	Does the campus award academic credit to students who demonstrate subject competency based on academic, occupational, or personal experiences? Yes No (If No, skip to Question 5.23.)
5.23	Are courses and breaks scheduled appropriately, given the students' academic background and the coursework involved? Yes No
5.25	Does the campus provide an environment for its faculty that is conducive to effective classroom instruction? Yes No
5.26	Are the quantity and type of instructional materials and equipment proportionate to the size of the campus and types of programs? Yes No
5.27	Based on the team's observation of the instructional materials used, interviews with students and faculty, and a review of software licenses, is the campus in compliance with applicable licensing and copyright laws? Yes \sum No
5.28	Are official transcripts for all qualifying credentials and for those credentials listed in the catalog on file for all instructors? ☐ Yes ☐ No
	If No, insert the section number in parentheses, list faculty names, degrees, and awarding institutions and explain: (Section 3-1-542): Official transcripts for qualifying credentials are not on file for all instructors. The following instructors did not have an official qualifying transcript on file:

			and	who are currently teaching, did not have any faculty
	files provide	ed to the tea	m.	
.29	Department International	of Education of Credential of determine	on been translated Evaluators (AICI	s not accredited by agencies recognized by the United States into English and evaluated by a member of the Association of E) or the National Association of Credential Evaluation Services the credentials to credentials awarded by institutions in the
	⊠ Yes	☐ No	☐ Not Applic	able (no faculty members hold foreign credentials)
.30	Is there doc Yes	umented evi	idence of a system	atic program of in-service training at the campus?
	If No insert	t the section	number in parent	neses and explain:
	activities to as in-service training. Fo	enhance fac e in Family r each session	culty expertise. The Education Rights on, the campus pro	and Privacy Act (FERPA) and homeland security active shooter
.31	activities to as in-service training. Fo outline of the	enhance face e in Family or each session ne information dence that ap	Education Rights on, the campus proon provided. These ppropriate faculty	e team found documentation of recent faculty training designated and Privacy Act (FERPA) and homeland security active shooter ovided the team with evidence of attendance by the faculty and an
.31	activities to as in-service training. For outline of the Is there evidentially, in Yes	enhance face in Family or each session information dence that application of the land of t	Education Rights on, the campus proon provided. These ppropriate faculty umentation to sup	e team found documentation of recent faculty training designated and Privacy Act (FERPA) and homeland security active shooter ovided the team with evidence of attendance by the faculty and an e topics are not related to curriculum and instruction. development plans have been developed and implemented
	activities to as in-service training. For outline of the last there evid annually, in Yes Is there evid meetings? Yes Is there an a	enhance face in Family or each session information dence that application of the land of the land of the land of the land of land of the l	Education Rights on, the campus proon provided. These ppropriate faculty umentation to supull-time and part-time	e team found documentation of recent faculty training designated and Privacy Act (FERPA) and homeland security active shooter ovided the team with evidence of attendance by the faculty and an e topics are not related to curriculum and instruction. development plans have been developed and implemented port completed activities listed on the plans? me instructors participate in regularly scheduled faculty art-time faculty to assure sound direction and continuity of

Describe the student services offered by the campus such as, but not limited to, structured tutoring, 5.44 academic or personal counseling, student orientation, etc.

The campus recently hired a director for student services who will focus on student retention, orientation, campus life, resources for the students, and graduation. As previously stated, the campus only offers tutoring to the students in the IEP if they are willing and able to pay for the tutoring themselves. It was shared with the team by the IEP program director that in most cases, the students are not able to afford to pay for tutoring.

5.45	opportunities, and what are this person's qualifications?
	Ms. Suzana Simic was recently hired as the director of career services and is responsible for the oversight of counseling students on employment opportunities. Ms. Simic has a bachelor's degree in liberal arts and had six years of experience as a career services coordinator and director of career services at other proprietary colleges prior to coming to this campus.
	services at other proprietary coneges prior to coming to this campus.
5,46	Does the campus offer employment assistance to all students? Yes No
	Not Applicable (campus enrolls only international students on a student visa)
5.47	Are follow-up studies on graduate and employer satisfaction conducted at specific measuring points following the placement of the campus's graduates?
	Yes No Not Applicable (there have been no graduates)
	If No, insert the section number in parentheses and explain:
	(Section 3-1-441(c)): Follow-up studies on graduate and employer satisfaction are not conducted at specific measuring points following the placement of graduates. It was shared with the team that the last graduate/employer surveys at the campus were conducted in September 2014. The campus has had graduates as recently as September 2015, and no graduate or employer surveys have been conducted for any of these graduates.
5.48	Does the campus use placement percentages or salary projections as part of its recruiting activities? Yes No
5.49	Describe the extracurricular educational activities of the campus (if applicable). Currently, the team found the campus takes students on field trips that are appropriate to their learning objectives. Students at the learning site are also provided the opportunity to attend theater productions at no cost to the student.
6. E	EDUCATIONAL FACILITIES
6.01	Describe the physical facility of the campus (include details such as campus location, square footage, distribution of space, parking situation, and any other pertinent information). The main campus is located on two floors of a former bank building. It comprises 23,000 square feet of appropriate classroom, lab, office, and break space. Parking is adequate, and the building is handicapped-accessible. All classrooms and labs are appropriately equipped.
6.02	Does the campus utilize any temporary additional space locations? ☐ Yes ☐ No
6.03	Does the campus utilize learning sites? ☑ Yes ☐ No

If Yes, list the name and address of each learning site and identify any administrative services offered at the site. (Please see section 13 for additional information)

The Wabash learning site is located at 180 North Wabash Avenue, Chicago, IL 60601. The learning site comprises 33,000 square feet on two floors of an eight-story office building in the Loop area in downtown Chicago. It is larger than the main campus and enrolls more students. All administrative services are provided at the learning site. Administrators at the main campus spend one or two days a week at the learning site. A full-time administrator is always on-site. Thirty faculty members are located at the learning site and thirteen faculty members are located at the main site.

6.04	Are all facilities (including additional space and learning sites) appropriate for the size of the student population and the programs offered?
	⊠ Yes □ No
6.05	Are the following appropriate to support the student population and the programs offered at all locations (including additional space and learning sites)? (a) Equipment
	∑ Yes □ No (b) Instructional tools
	Yes No (c) Machinery
	Yes No
6.06	Is there evidence on file to show that all campus facilities are in compliance with fire, safety, and sanitation regulations?
7. P	PUBLICATIONS
7.01	What catalog was used during the evaluation (please include the year, number, and volume, if appropriate)?
	The SOLEX College catalog dated 2016 was reviewed during the visit.
7.02	Does the self-study or branch application part II accurately portray the campus? ∑ Yes □ No
7.03	Does the campus publish a catalog that is appropriately printed and bound and available to all enrolled students?
	∑ Yes □ No
7.04	Does the catalog contain the following items?
	(a) A table of contents and/or an index.
	Yes No (b) An indication of the year or years for which the catalog is effective on the front page or cover page.
	Yes No
	(c) The names and titles of the administrators.
	∑ Yes

(d)	A statement of legal control which includes the names of trustees, directors, and officers of the
	corporation.
\boxtimes	Yes No
(e)	A statement of accreditation
X	Yes No Not Applicable (initial applicant)
(f)	A mission statement.
	Yes No
	A listing of full-time faculty members which lists all qualifying credentials held along with the
(4)	awarding institution and the area of teaching specialization.
	Yes No Not Applicable
$\overline{}$	An academic calendar.
	Yes No
	A full disclosure of the admission requirements.
$\stackrel{\cdot \cdot \cdot}{\sqcap}$	Yes No
6)	A statement for each curriculum offered that includes a statement of objective or purpose; an accurate
U)	and complete listing of all courses in the curriculum with a unique identifying number and title, the
	credit or clock hours awarded; the total credit or clock hours required to complete the curriculum; any
	necessary requirements for certification, licensing, or registration needed to work in the field; and any
	additional requirements that must be met to complete the curriculum.
	Yes No
_	A description of each course offered that includes the identifying number, title, credit or clock hours
(v)	awarded, a concise description of the course contents, and any necessary prerequisites.
M	Yes No
	An explanation of the grading system that is consistent with the one that appears on the student
(1)	transcript.
∇	Yes No
_)A definition of the unit of credit.
<u>``</u>	Yes No Not Applicable (The campus does not award credit.)
	A complete explanation of the standards of satisfactory academic progress.
	Yes No
_	A description of the certificates, diplomas, and/or degrees awarded along with a statement of the
(0)	requirements necessary for completion of each.
M	Yes No
	The transfer of credit policy.
	Yes No
	A statement of the tuition, fees, and any other charges.
	Yes No
(r)	A complete and accurate listing of all scholarships, grants, and/or loans offered.
$\stackrel{(\cdot)}{\Box}$	Yes No Not Applicable (no scholarships, grants, or loans offered)
(c)	The refund policy.
<u>``</u>	Yes No
	A statement describing the student services offered.
	Yes No
	A student grievance policy that includes the name and address of ACICS (may be in the student
(α)	handbook instead of catalog).
\square	Yes No Not Applicable (initial applicants only)
\sim	Los

	If No for any item, insert the section number in parentheses and explain: (Section 3-1-701 & Appendix C): The catalog does not meet Council standards in a number of areas: 1. The curricula published in the institution's catalog does not state any objectives specific to the IEP curriculum.
	2. Information concerning payments of tuition and fees is not consistent with the practice on campus. See question 4.42 for the details.
	3. The SAP policy is missing some required components.
	4. While the team was onsite, the campus added the following to their revised catalog, "A student may do a general application and take any class from a program without being admitted to that program as long as the class chosen does not have a prerequisite." However, that is not appropriate since students must be admitted to a program (in order to complete all requirements of the enrollment agreement).
7.05	Does the campus offer degree programs? ☐ Yes ☐ No
	If Yes, does the catalog contain the following? (a) An explanation of the course numbering system (for all levels). ☐ Yes ☐ No (b) Identification of courses that satisfy general education requirements (for occupational associate's, academic associate's, and bachelor's degrees only). ☐ Yes ☐ No ☐ Not Applicable (c) Identification of courses that satisfy the concentration requirements (for academic associate's and bachelor's degrees only). ☐ Yes ☐ No ☐ Not Applicable (d) Identification of courses that satisfy the upper-division (for bachelor's degrees only). ☐ Yes ☐ No ☐ Not Applicable
7.06	Does the campus offer courses and/or programs via distance education? Yes No (If No, skip to Question 7.07.)
7.07	Does the catalog contain an addendum/supplement? ☐ Yes ☐ No (If No, skip to Question 7.08.)
7.08	Is the catalog available online? ☐ Yes ☐ No (If No, skip to Question 7.09.) If Yes, does it match the hard copy version? ☐ Yes ☐ No
7.09	Does the campus utilize a multiple-school catalog? ☐ Yes No (If No, skip to Question 7.10.)

7.10	Is all advertising and promotional literature, through any type of media (social media, website, newspapers, etc.), truthful and dignified? Yes No
7.11	Is the correct name of the campus listed in all advertising, web postings, and promotional literature? Yes No
7.12	Where does the campus advertise (publications, online, etc.)? The campus advertises via its website, brochures, flyers, and on social media.
	Are all print and electronic advertisements under acceptable headings? ☑ Yes ☐ No
7.13	Does the campus use endorsements, commendations, or recommendations in its advertising? Yes No (If No, skip to Question 7.14.)
7.14	Does the campus utilize services funded by third parties? Yes No (If No, skip to Question 7.15.)
7.15	Does the campus avoid offering monetary incentives to attract students and avoid making guarantees for job placement or salary for graduates? Yes No
7.16	Is the phrase "for those who qualify" properly used in all advertising that references financial aid? Yes No Not Applicable (campus does not participate in financial aid)
7.17	What institutional performance information does the campus routinely provide to the public? The campus routinely provides program retention rates and employment placement rates to the public.
	Where is this information published and how frequently is this information being updated? The institutional performance information is published on the school's website on an annual basis.
8.	LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY
FOR	ALL PROGRAMS
8.01	Does the campus develop an adequate base of library resources? ☑ Yes ☐ No
8.02	Does the campus ensure access of library resources to all faculty and students, including students at nonmain campuses? ☐ Yes ☐ No
8.03	Does the campus provide training and support to faculty and students in utilizing library resources as an integral part of the learning process? Yes No

8.04	Are adequate start provided to support the development, organization of the collection, and access of library resources? Yes No
8.05	Describe how the campus develops continuous assessment strategies for resources and information services?
	At the time of the visit, the only active program offered at the main campus was the IEP. An additional program, PTA, is offered currently at the learning site and is programmatically accredited by CAPTE. The team found an adequate selection of IEP resources in the library at the main campus and was also provided information stating that the school subscribes to the ProQuest online nursing and allied health database, which the students and the faculty can access from any computer.
	Are these methods appropriate? ⊠ Yes □ No
8.06	Is the library staff adequately trained to support the library? ☐ Yes ☐ No
	OCCUPATIONAL ASSOCIATE'S, ACADEMIC ASSOCIATE'S, BACHELOR'S, AND TER'S DEGREES ONLY
8.07	Is the campus's established annual budget appropriate to the size and scope of the campus and the programs offered, and is the allocation appropriately expended for the purchase of books, periodicals, library equipment, and other resource and reference materials? Yes No
8.08	What is the amount of the current year's library budget excluding personnel allocations? The current year's library budget is \$29,782.
8.09	What portion of the current year's library budget has been spent? A total of \$9,610 has been spent to date from the library budget.
	How has the money been allocated? The allocation of the expenditures for the current year is as follows: book acquisitions, \$1,800; periodicals \$120; videos and other media, \$120; staff and operations, \$6,000; remodeling and maintenance, \$1,350; and software and labeling, \$230.
8.10	Is there evidence that the faculty have major involvement in the selection of library resources? ☑ Yes ☐ No
8.11	Are the library hours adequate to accommodate the needs of all students? ☐ Yes ☐ No

FOR NONDEGREE PROGRAMS ONLY

8.26	Are appropriate reference materials and periodicals available for all programs offered? Yes No
8.27	Are the instructional resources organized for easy access, usage, and preservation? Yes No
8.28	Is there a current inventory of instructional resources? ☑ Yes ☐ No
8.29	Does the campus have appropriate and sufficient instructional resources, equipment, and materials to meet its educational program objectives and the needs of its students? Yes No
FOR	OCCUPATIONAL ASSOCIATE'S DEGREES ONLY
8.30	Has the campus designated an individual with the ability to maintain the resources and to assist students and faculty? ☑ Yes ☐ No
8.31	Do the resources include the study, reading, and information technology facilities necessary to support the effectiveness of all the courses and programs offered by the campus? Yes No
8.32	Is there a current inventory of instructional resources, including online resources? ☑ Yes ☐ No
8.33	Are the resources organized for easy access and usage? ∑ Yes □ No
8.34	Is it evident that faculty encourages the use of the library? ☐ Yes ☐ No
8.35	Do the library holdings, including online collections, support all of the offerings of the campus? Yes No

ENGLISH AS A SECOND LANGUAGE

F.01 Who is assigned to administer the academic program(s), and what are this person's qualifications?
Ms. Jill Pomerantz serves as the IEP director and is assigned to oversee the IEP certificate program at both the SOLEX main campus and the Wabash learning site. She holds a master's degree in TESL from Northeastern Illinois University in Chicago and a master's degree in Spanish literature from Universidad de Complutense in Madrid, Spain. Furthermore, she also holds a bachelor's degree in Spanish language

	and culture from California State University in Northridge. Ms. Pomerantz was an IEP instructor at SOLEX College for almost eight years before being promoted to program director.
F.02	Does this individual possess appropriate academic or experiential qualifications? ☑ Yes ☐ No
F.03	Is there evidence that the program administrator has sufficient authority and responsibility for the development and administration of the educational program(s)? Yes No
F.04	Are the time and resources devoted to the administration of the educational program(s) sufficient? Yes No
F.05	Does the curriculum evidence a well-organized sequence of appropriate subjects leading to an occupational objective, an academic credential, or both? Yes No
F.06	Does the catalog and/or other advertising material such as brochures and the institution's web site, accurately describe the program and its objectives? Yes No
	If No, insert the section number in parentheses and explain: (Section 3-1-513(a) and Appendices C & F): The curriculum is not being followed as published in the catalog. There are two stages of specific courses in the catalog, designated as Stage I and Stage II. All students take the Cambridge Michigan Language Assessment (CaMLA) entrance exam and are generally placed somewhere within the Stage I IEP course sequencing. After completing 648 clock hours (31.5 credit hours), the student is supposed to be awarded an IEP certificate; however, after reviewing student files and speaking with students, all that is evidenced is a transcript acknowledging a graduation date for when the students completed the 648 clock hours (31.5 credit hours), with no documentation of the awarding of a certificate.
	The institution accommodates students working towards a certificate as well as those just taking IEP-specific courses. The catalog identifies Stage 1 as also containing a basic level below level 1 and then 6 additional levels. Per the last program modification in 2015, the ACICS approval does not reflect the basic level, only levels 1 through 6. Each level contains three sessions consisting of 72 clock hours/3.5 credit hours per session.
	Furthermore, while onsite, the institution attempted to rectify many catalog issues; however, the course sequencing for the higher advanced electives are not sequentially numbered. ESL 170 omits (a) and (b)

The team identified discrepancies between the information given on the institution's website and the catalog. The institution was able to rectify these discrepancies.

F.07 Is an appropriately detailed syllabus on file for each course that includes:

sessions for Grammar for Editing I and II, and are not sequential.

(a) Title and course descriptions?

	⊠ Yes
	(b) Course numbers?
	Yes No
	(c) Course prerequisites and/or corequisites? ☐ Yes ☐ No
	(d) Instructional contact hours/credits?
	Yes No
	(e) Learning objectives?
	Yes No
	(f) Instructional materials and references?
	∑ Yes
	(g) Topical outline of the course?
	⊠ Yes □ No
	(h) Instructional methods?
	(i) Assessment criteria?
	(j) Method of evaluating students?
	∑ Yes
	(k) Date the syllabus was last reviewed?
	☐ Yes ☐ No
	(Section 3-1-513(a) and Glossary): The course syllabi do not include prerequisite courses for the Stage II
	electives and beyond high advanced IEP. At the time of the visit, there were four courses from the IEP Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them.
F.08	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no
F.08 F.09	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program?
	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities.
	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No
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	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No
	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No No (b) Instructional equipment.
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	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No (c) Resources. Yes No
F.09	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No (c) Resources. Yes No (d) Personnel. Yes No
	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No (c) Resources. Yes No (d) Personnel. Yes No Are the following elements appropriately incorporated into the instructional components of the program?
F.09	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No (c) Resources. Yes No (d) Personnel. Yes No Are the following elements appropriately incorporated into the instructional components of the program? (a) Systematic planning.
F.09	Stage II actively in progress. According to the IEP director, Ms. Pomerantz, and the information contained in the catalog, the prerequisite to enter Stage II is completion of Stage I IEP level 6. Furthermore, no syllabi on file had review dates listed on them. Do students confirm that they receive a course syllabus and that it is followed? Yes No Are the following appropriate to adequately support the number of students and nature of the program? (a) Facilities. Yes No (b) Instructional equipment. Yes No (c) Resources. Yes No (d) Personnel. Yes No Are the following elements appropriately incorporated into the instructional components of the program?

	Yes No (c) The selection and use of appropriate and current learning materials.
	 ✓ Yes ✓ No (d) Appropriate modes of instructional delivery.
	 ✓ Yes □ No (e) The use of appropriate assessment strategies. ✓ Yes □ No
	(f) The use of appropriate experiences. ☐ Yes ☐ No
F.11	List the community resources and describe how they are utilized to enrich the program(s). IEP instructors at both the SOLEX main campus and the Wabash learning site have a plethora of areas in which to take the students on field trips. The learning site showed evidence of many field trips taken within walking distance of the learning site location, giving students ample opportunities to practice language acquisition while learning and experiencing the city's rich history. All field trips follow a process in which a request is forwarded to the director of IEP, and the director will approve or deny the request. After reviewing the most current folder with field trip requests, it was evident that all trips tie into the curriculum and showed justification of pertinence.
F.12	Is the utilization of community resources sufficient to enrich the program? ☑ Yes ☐ No
F.13	Are all faculty assigned to teach in no more than three fields of instruction, with no more than five preparations? ☑ Yes ☐ No
F.14	Is the size of the faculty appropriate to the total student enrollment? ☑ Yes ☐ No
F.15	Does the campus demonstrate the involvement of ESL faculty in professional organizations and workshops, enabling them to meet the special needs of the ESL student? Yes No
F.16	Do the faculty members' qualifications meet the minimum requirements outlined in the <i>Accreditation Criteria</i> , and are their qualifications academically and experientially appropriate to the subject matter they teach and the level of the credential awarded? Yes No
	If No, insert the section number in parentheses, list the faculty and course, and explain: (Section 3-2-104(c)): Not all faculty members have evidence of qualifications to teach in the intensive English program. During the visit, there were 36 faculty teaching courses in the IEP program, including both Stage I and Stage II. After reviewing faculty folders, it was identified that many faculty members did not demonstrate competency in the assigned field, such as academic or vocational training and credentials.
	needs proof for qualification for teaching ESL; needs proof for qualification for teaching ESL;

	needs proof for qualification for teaching ESL; needs official transcripts to confirm qualifications for teaching ESL courses; needs official transcripts and needs proof for qualification for teaching ESL; needs official transcripts and has ESL certification for grades 6-12 only; needs official transcripts to confirm qualifications for teaching ESL courses; needs proof for qualification for teaching ESL; needs proof for qualification for teaching ESL; needs proof for qualification for teaching ESL as well as official transcripts;
	needs proof for qualification for teaching ESL; did not have faculty files provided to the team.
F.17	Do all instructors teach no more than 32 hours per week (except for an overload of one subject allowed with additional compensation)? Yes No
F.18	What is the current student/teacher ratio? The current student/teacher ratio is 10:1.
F.19	Is the current student-teacher ratio reasonable for the mode of delivery and course content? ☐ Yes ☐ No
FOR	STAND-ALONE ESL PROGRAMS ONLY
F.20	Does the campus administer a nationally recognized entrance and exit examination? Yes No
	If Yes, please provide the name of the examination The institution uses the Cambridge Michigan Language Assessment (CaMLA).
F.21	Does the admissions policy for the ESL program meet ACICS and Department of Education standards by requiring that admitted participants be undergraduate students who either: (a) have previous knowledge, training and skills in a vocational field?
	OR (b) are solely enrolled to obtain ESL competency unrelated to a vocation? Yes No
F.22	Does the program lead to a degree or certificate? Yes No Not Applicable (not a stand-alone program)
	If No, insert the section number in parentheses and explain: Section 3-1-521): The IEP does not award a credential as approved by ACICS. The school gives a certificate of completion.
F.23	Is the length of the program: At least one year in length (public or non-profit institution of higher education)?

OR
At least six months in length (postsecondary vocational intuition or a proprietary institution of higher education)?

Yes No

COMMENDATIONS:
The team would like to commend the passion as an instructor and desire to see them succeed. The team would also like to commend who was incredibly helpful throughout the visit.

LEARNING SITE REVIEW

 Who has responsibility for the administration of the learning site? Describe the individual's academic credentials and professional experience.

Dr. Leon Linton, president, is responsible for the administration of the learning site. As earlier noted, holds an Ed.D. degree in organizational leadership from Argosy University, an MBA degree from the Keller Graduate School of Management, and a master's degree in radio frequency engineering from the Minsk Engineering Institute. He started at the institution in September 1995.

Ms. Tatiana Hamilton, director international students, is responsible for the learning site in the absence of Dr. Linton. Ms. Hamilton holds a master's degree in engineering from Volgograd State University. She joined SOLEX College as the director of international students in January 2003.

- 2. What is the distance (i.e. driving or walking distance) between the learning site and the campus that has administrative oversight of it?
 - The Wabash learning site is located approximately 28 miles from the main campus.
- 3. Describe how appropriate provisions have been made for supervision and monitoring of the learning site by the administration of the campus that is administratively responsible for the learning site. Dr. Linton supervises and monitors the learning site. Dr. Linton works from the learning site about two days a week. On the days he is not working from the learning site, Ms. Hamilton works from the learning site. Most of the administrative staff work at the main campus location but have offices in the learning site and work from there once or twice weekly.
- 4. Describe how students at the learning site are provided with access to student services, identifying if services are provided at the learning site or the oversight campus.
 Ms. Roxanne Peplow, director of student success, is responsible for providing student services at the learning site. Ms. Peplow is based at the main campus but, as with other staff members, travels to the learning site regularly to meet with students.
- 5. List the staff members employed only at the learning site, if applicable.
 - Mr. Freddy Sanchez, assistant IT and multimedia specialist
 - Ms. Carla Hernandez, office clerk, admissions assistant
 - Mr. Mazen Kako, admissions representative
 - Ms. Carolis Munoz, receptionist
 - Ms. Yeimy Marquez, admissions representative
 - Ms. Hannah Piper, assistant registrar
 - · Mr. Dashun Taylor, associate director of admissions
- 6. Describe how students are informed, during the recruitment and enrollment process, that they will be attending classes at the learning site location. Are full programs offered at the learning site or only courses? Please specify.

The IEP and PTA programs are fully offered at the learning site. The school lists both locations as well as the programs offered at each in all their advertising. Students select which campus they would like to attend on their application forms.

- 7. Cite evidence that the learning site employs a sufficient number of faculty members for the number of courses offered and the size of the student population.

 The learning site has 30 part-time faculty members with a student population of 252 students.
- 8. List the instructional equipment available for faculty and student usage at the learning site. The learning site has appropriate equipment to train students in the two programs offered.
- 9. Describe the physical facility. Does it appear to be adequate and appropriate to support the educational programs offered and the current enrollment at the learning site?

 The learning site is located on the 2nd and 5th floors of an 8-story building in downtown Chicago. There are 33 classrooms/computer labs at the learning site. The physical therapist assistant lab has three rooms with areas for equipment storage, class seating, and practical applications. They have a large student lounge and a faculty lounge, as well as a faculty work room. There are 12 assigned offices for the staff members.
- 10. Describe how the learning site is referenced in all advertising, including the catalog of the oversight campus.
 - The learning site is clearly referenced in the school's catalog, website, and Facebook page as the Wabash learning site.

SUMMARY

Based on the team's review, the following areas require an explanatory response:

Number	Section	Summary Statement
1	3-1-111	The CEP does not meet Council requirements (pages 5 and 6).
2	3-1-303(a)	Adequate records are not kept by the institution relative to financial
		administrative operations (page 8).
		The placement rates reported in the CAR could not be verified in some
		programs (page 23).
3	3-1-303(e)	The transcript for the intensive English program does not identify the
		credential earned (page 9).
	2.1.410	
4	3-1-410	There is no evidence that third party contractors are supervised and maintain familiarity with the institution (page 10).
		Tanimarity with the institution (page 10).
5	3-1-421, 3-1-701,	The SAP policy does not include all components as required by Appendix D
	and Appendices C	(pages 14 and 29).
	and D	
6	3-1-423	The institution does not encourage or assist students who are experiencing
		difficulty in progressing satisfactorily in their programs (page 16).
7	3-1-432, 3-1-701,	All charges are not consistent for similarly circumstanced students enrolling
	and Appendix C	at the same time and in the same programs (pages 16, 17, and 29).
8	3-1-434(c)	There is no evidence of professional awareness on the part of the financial
		aid administrator (page 19).
9	3-1-441(c)	Follow-up studies on graduate and employer satisfaction are not conducted at
	0-1-441(c)	specific measuring points following placement of the graduates (page 26).
10	3-1-513(a) and	The course syllabi do not include prerequisite courses or the last date of
	Glossary	review (page 34).
11	3-1-513(a), 3-1-701,	The curriculum is not being followed as published in the catalog (pages 29
11	and Appendices C	and 33).
	& F	
12	3-1-521	The institution does not confer the credential as approved by ACICS (pages
		20 and 36).
4.3	2 1 543	
13	3-1-542	Official transcripts for qualifying credentials are not on file for all instructors
		(pages 24 and 25).
L		

14	3-1-543 and Glossary	The faculty development plans does not include appropriate in-service activities to enhance faculty expertise (page 25).
15	3-1-701 and Appendix C	The catalog does not meet Council standards in a number of areas (page 29).
16	3-2-104(c)	Some faculty members have not documented competency to teach in the intensive English program (pages 35 and 36).



August 26, 2016

ID Code 00024422(MC)

acics@solex.edu

VIA E-MAIL AND UPS DELIVERY

Dr. Leon E. Linton Chief Executive Officer SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090

Dear Dr. Linton:

SOLEX COLLEGE, WHEELING, IL WABASH LEARNING SITE, CHICAGO, IL ID CODE 00024422(MC) ID CODE 00267203(LS)

Subject: Renewal of Accreditation Show-Cause Directive Letter

The Council reviewed your institution at its recent meeting, including the institution's application for renewal of accreditation, the report for the on-site evaluation visit conducted in May 2016, and the institution's response to the visit report. As a result of its review, the Council found the following based on the *Accreditation Criteria:*

- 1. The Campus Effectiveness Plan (CEP) does not meet Council requirements (Section 3-1-111).
- The placement rates reported in the Campus Accountability Report (CAR) could not be verified in the Information Technology Career Program (Section 3-1-303(a) and 3-1-203).
- 3. The transcript for the Intensive English Program (IEP) does not identify the credential earned, the curriculum for the IEP program is not being followed as published in the catalog, and the institution does not confer the credential for the IEP program as approved by ACICS (Sections 3-1-303(e), 3-1-513(a), 3-1-521, 3-1-701, and Appendices C and F).
- 4. There is no evidence that third-party recruiting agents are properly supervised to ensure that they are communicating current and accurate information on behalf of the institution (Sections 3-1-410 and 3-1-412(a)).

- 5. The campus does not encourage or assist students who are experiencing difficulty in progressing satisfactorily in their programs (Section 3-1-423).
- 6. Inadequate records are being kept relative to administrative operations as evidenced by charges that are not consistent for similarly circumstanced students enrolling at the same time and in the same programs consistent with statements in the catalog (Section 3-1-303(a), 3-1-432, 3-1-701 and Appendix C).
- 7. There is no evidence of professional knowledge on the part of the financial aid administrator (Section 3-1-434(c)).
- 8. Follow-up studies on graduate and employer satisfaction are not conducted at specific measuring points following placement of the graduates (Section 3-1-441(c)).
- 9. Official transcripts for qualifying credentials are not on file for all instructors (Section 3-1-542).
- 10. The faculty development plans do not include appropriate in-service activities to enhance faculty expertise (Section 3-1-543 and Glossary).
- 11. A number of faculty members, as confirmed by the institution, have not documented competency to teach in the Intensive English Program (Section 3-2-104(c)).
- 12. As detailed in a 2015 Office of the Inspector General (OIG) report, there are serious concerns about whether the institution has the administrative capability and knowledge to comply with student financial aid regulations (Section 3-1-434).

Council Action

Due to the significant nature of the findings discovered during the institution's on-site evaluation visits, concerns raised by third-party adverse information received by the Council, and the inability of the institution to provide evidence to resolve these concerns and findings, the Council directed the institution to show-cause why its application for renewal of accreditation should not be denied or otherwise conditioned during the December 2016 review cycle. The institution is required to review and follow the Council hearing procedures as detailed in Section 2-3-500 of the *Accreditation Criteria* and the "Schedule of Fees" listing on the ACICS website. The institution must provide the appropriate notification and fee within ten days of receipt of this notice.

In response to the directive, the institution must submit the following information by **November 1, 2016**:

- 1. A revised CEP with evidence that the campus has collected appropriate data to support graduate and employer satisfaction. The campus must describe the methodologies used to collect data; provide a rationale for using each type of data along with a summary and analysis of the data collected; and an explanation of how the data have been used to improve the educational processes at the campus. The surveys used to evaluate graduate and employer satisfaction must be dated to reflect the evaluation period and must clearly identify the responder. The analysis of these surveys should include the number of surveys sent and the number returned. This information must be included for each group of graduates and employers surveyed. In addition, the campus must provide a description explaining how the outcomes addressed in the CEP at both the program and course levels evaluate that learning has occurred. The institution must also include a program improvement plan for the Information Technology Career program.
- A revised 2015 CAR that reclassifies the graduates—
 as not placed in field and include back-up documentation to substantiate the reclassification. Furthermore, in order to determine whether the campus is accurately classifying its students as placed according to the ACICS definition of placement, the campus must complete the Placement Verification Program spreadsheet for the months of January 2016—June 2016 and submit the information to the Council by **September 15, 2016**. The spreadsheet must include every student who was placed during those months.
- 3. Evidence that the IEP program is administered as approved by the Council, which includes issuing an academic credential for the completion of the program. Alternatively, the institution may submit non-credit, short-term applications to reflect program levels as administered. Documentation must include course syllabi, current course schedule, transcripts indicating the graduation date, and a copy of the certificate awarded for all IEP graduates for the period January 1, 2016. October 15, 2016. The Council notes, that if the IEP program remains as an approved program by the Council (as opposed to a series of non-credit, short-term applications), then there may be concerns as to how the institution meets the eligibility requirements, pursuant to Section 1-2-100(a) in the *Accreditation Criteria*. In that case, the institution would not enroll "a majority of its students in one or more programs, the content of which is on a postsecondary academic level and which leads to a postsecondary academic credential (such as a certificate, diploma, or degree) or an occupational objective."

- 4. Evidence that the institution systematically and effectively monitors the recruitment activities of its third-party agents to ensure that accurate and current information is communicated to prospective students. The institution must also provide documentation to support the monitoring, evaluating, training, and supervising of all activity conducted by its referral agents. If a referral agent has not received appropriate training, then the institution must provide evidence that the campus has formally terminated their services. In addition, the institution must provide a list of all active referral agents and the current contract the institution has with this agency.
- 5. Evidence that the institution has developed and implemented a policy to provide counseling to its students. Documentation must include, but is not limited to, a formalized plan of the counseling process, counseling forms that are signed by both student and a representative of the institution, and completed tutoring forms that are signed by the student and the faculty member and that includes the areas covered during tutoring. In addition, the campus must provide evidence that students have the ability to avail themselves of academic counseling services at a reasonable time and cost. Furthermore, the campus must provide a copy of the tutoring contracts for the "for-pay" tutors.
- 6. Evidence that the individual who was hired to oversee the student financial aid processing and records is qualified. Documentation must include a signed job description, a resume, an ACICS Data Sheet, and copies of official transcripts for all earned training certificates or credentials. In addition, the institution must provide a revised catalog that includes a detailed description, application process, and qualification for the tuition and fee waiver provided to students. The campus must also provide a list of all students who were granted a tuition and fee waiver between January 1, 2016—October 15, 2016, along with a ledger card and the fee waiver documents signed by the student and administrator for each enrollment. In addition, the institution must also provide a list of all students from that same time period who were denied the waiver of tuition and/or fees and an explanation of how this denial fit within the policy.
- 7. Evidence that there is professional training and experience on the part of the financial aid administrator. Documentation must include evidence that Ms. Anahi Huerta attended the 2017-2018 FAFSA Update Training that was held on June 28, 2016, along with evidence of any other trainings completed by this individual prior to October 15, 2016.
- 8. Evidence that follow-up studies on graduate and employer satisfaction are conducted at specific measuring points following placement of the graduates. The campus must provide follow-up studies on all employer and graduate satisfaction for the period January 1, 2016 October 15, 2016. Furthermore, the institution must provide a summary and analysis of both the graduate and the employer surveys. This summary and

- analysis may be included within the revised Campus Effectiveness Plan (CEP) also required to be submitted by the campus.
- 9. Evidence that the institution maintains official transcripts for all current faculty members. The institution must provide a class schedule for the current term listing the instructor assigned for each course; and for each instructor listed, the institution must provide copies of official transcripts for all qualifying credentials and for those credentials listed in the catalog. The institution must also provide evidence of the notice of resignation for
- 10. A current faculty development plan for each instructor along with documentation that all in-service activities listed on the plans to be completed prior to October 15, 2016, have been completed. The in-service training should focus on subject matter content, curriculum concepts, new theories, and instructional techniques. In-service trainings must be available to all faculty members, and the institution needs to ensure that the information presented in these trainings is being provided to any faculty who could not attend an in-service training. In addition, the campus must provide the annual in-service schedule for 2016 and 2017, along with evidence of attendance by the faculty, a copy of the in-service training materials, and meeting minutes.
- 11. Evidence that the campus has qualified faculty members to teach each course in the Intensive English Program (IEP). Documentation must include a class schedule for the current term listing each faculty member in the IEP program and an employment letter, job description, ACICS Data Sheet, resume, and copies of training certificates and official transcripts for each one of the faculty members listed on the schedule. In addition, the campus must provide a detailed explanation for how it was possible that the campus employed such a high percentage of unqualified faculty members in the IEP program. Upon completion of this review, the campus then must provide a detailed plan for how it will ensure that there will be a qualified faculty member to teach each course and that the campus will have a sufficient number of qualified faculty members to teach the courses assigned. Finally, the campus must provide evidence that this plan has been systematically and effectively implemented and that all individuals responsible for hiring faculty understand the plan and have been trained according to the new campus policies on hiring faculty members.
- 12. Evidence that the findings detailed in the referenced OIG report have been resolved. The institution must provide an explanation of the changes made to the administration of financial aid as a result of the findings and provide evidence that these changes have been fully implemented at the institution. The institution must also provide all communication

to and from the Office of Inspector General and the Department of Education since the OIG report was issued through the date of submission of its response to this letter.

Please submit eight hard copies of your response and one electronic copy via flash drive by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

Institutional Teach-Out Plan

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution is directed to submit a contingency teach-out plan to the Council office by **October 31, 2016**, which must include:

- a. A listing of students with the student name; program of study; expected graduation date; and status of unearned tuition, status of refunds due, and current account balance for each student.
- b. A listing of comparable programs offered at other institutions in case teach-out agreements or transfer arrangements are needed for students to complete their programs elsewhere.
- c. A custodian for all permanent academic records in case of closure that includes contact information for this individual or entity and the process by which students can obtain their records.
- d. A description of the financial resources available to ensure that students can complete their programs or receive refunds if the institution does cease operations.

We look forward to receipt of the requested information by the dates specified above. Failure to file the requested information may result in the suspension of the institution's grant of accreditation.

Please contact Ms. Cathy Kouko at (b)(6)	@acics.org or (202) 336-6790 if you have any
questions.	
Sincerely,	
(b)(6)	

Roger J. Williams Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Mr. Douglas Parrott, U.S. Department of Education, Chicago/Denver School Participation Team- Region V & VIII (douglas.parrott@ed.gov)
 - Mr. Adam E. Campbell, Illinois Board of Higher Education (6)(6) (ibhe.org)
 - Ms. Sandra Wise, The Commission on Accreditation in Physical Therapy Education @apta.org)



November 2, 2016

Evaluation Team Report - SPECIAL VISIT REPORT

ID for Campus Visited: 00024422

Main Campus ID: 00024422

Staff Contact: Mr. Chad Hartman - Phone: (202) 336-6841

Application ID: 70454

VISIT RESPONSE DUE DATE: November 14, 2016

Dr. Leon E. Linton President SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090 acics@solex.edu

Dear Dr. Linton:

A copy of the report prepared by the Council's evaluation team that recently visited your institution is attached. The Council invites you to respond to this report in two ways before it takes formal action on your institution's application for accreditation. First, please acknowledge that you have received and read the report and include any comments about the report or the visit by uploading your acknowledgment and comments in the online application and selecting the label "Acknowledgment of Visit Report." Second, please submit your response to the findings in the report via your online application under "Citations." The Council offers the institution ten days to formally respond to the report; therefore, your response should be uploaded by the date indicated above.

We look forward to receiving your response. You will be notified in writing of the Council's decision following its next meeting.

Visit Response

Your response should pertain to the findings notated in the report or letter. The following information provides suggestions for developing your response. Please include information on any significant changes that have taken place at the institution since the site visit.

Web-Based Submission of Campus Response

ACICS has implemented a web-based submission process for all visit responses. The response to each finding must be uploaded under the application ID number associated with the visit (this is noted on the cover page of the team report). Each finding must include a narrative and supporting documentation (if applicable). If supporting documentation covers more than one finding, the campus is required to duplicate the documentation and upload it in each finding. Submission of a current catalog need only be uploaded

once and only if referenced in the response. If you have any questions, please send your inquiry to Linda Lundberg at (b)(6) @acics.org.

Process:

Once the campus logs on to the ACICS membership website, go to the "In Process Applications" heading, select the application name and ID. The campus will then click either "Citation Documents" and upload each response document as described below. (Please see the attached "Preparing the Institutional Response" for step-by-step visual instructions on how to upload your response into your institution's Member Center Account.)

IMPORTANT: Document Labels

The institution may name the document any appropriate file name. However, each document must be labeled with the corresponding 'Document Type.'

Example: the document type submitted to satisfy response:

Finding 1 Narrative task must be labeled Narrative 1.

If a campus needs to submit multiple pieces of information to support one citation response, this information should be combined into one document prior to uploading. Note: The capacity size for each upload task is 100MB, if this combined document exceeds this limit, then the campus may separate the document and upload each of these documents separately with different file names, as long they are labeled with the correct "Document Type."

Response Tasks

Below is the format for how the listing of "Document Type" will appear once the document is uploaded. Each visit type will have a standard amount of visit *Response* tasks. Upload your response document and label each one accordingly. Ignore tasks that exceed your response requirement.

Narrative 1 Supporting Document 1 Narrative 2 Supporting Document 2 Narrative 3 Supporting Document 3

Responses should be professional in appearance. The responses should be paginated and well-organized to ensure a complete and sufficient review.

Sincerely,

(b)(6)

Linda J. Lundberg Accreditation Content Editor Accreditation and Institutional Development

Attachments



SPECIAL VISIT REPORT

SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090 ACICS ID Campus Code: 00024422

Dr. Leon E. Linton, President (b)(6) @solex.edu)
(acics@solex.edu)

LEARNING SITE
WABASH LEARNING SITE
180 N. Wabash Ave.
Chicago, IL 60601
Learning Site Code: 00267203

October 12-13, 2016

Dr. Darlene Ann

Minore

Chair

Minore Educational

Bainbridge Island,

WA

Strategies, LLC,

Bainbridge

Graduate Institute, former director of

compliance

Ms. Rogena Kyles

Student Relations

Executive Education

Alexandria, VA

Management Group, Inc.,

attorney

Mr. Chad Hartman

Staff Representative

ACICS

Washington, D.C.

1. VISIT CONTEXT - INTRODUCTION

A. Provide a summary and reason(s) for the visit including assessment of risk, Council directive, external factors, etc.

The special visit team conducted a two-day unannounced visit. The goal of the visit was to determine if the institution was open and conducting classes as usual, making progress in the efforts to come into compliance with *Accreditation Criteria* as summarized below, and the institution's position and intent given the U.S. Department of Education (US DOE) September 16, 2016, final audit report.

An evaluation visit for renewal of accreditation for SOLEX College was conducted May 11-12, 2016. Although the campus was approved to offer 10 certificate and occupational associate's degree programs, only 3 programs currently have students enrolled: the certificate in Intensive English Program (IEP), the certificate in medical assisting (MA), and the occupational associate's degree in physical therapist assistant (PTA). The Commission on Accreditation in Physical Therapy Education (CAPTE) programmatically accredits the PTA program, with this accreditation expiring in 2019.

On July 1, 2016, the institution began offering classes for the certificate in medical assistant program. There are 372 students currently enrolled. The administration of the campus was off site for an administrative planning meeting when the team arrived on the first day of the visit. The team was informed that the reason for this meeting was planning for a teach-out of programs per the Council Show-Cause Directive letter dated September 1, 2016. As soon as the institution's president was notified of the unannounced visit, the meeting was adjourned and the administrative team returned to the Wheeling campus to meet with the team.

The team observed upon arrival a fully functioning main campus. Administrative staff was working at their desks and day classes were in session. Schedules for the current term were posted on notice boards and showed an enrollment of over 100 students for the day IEP program. The majority of medical assistant and physical therapy assistant students are located at the Wabash learning site. Day IEP students were quickly assembled to take the ACICS student survey as requested by the team.

At the time of visit, based on the reaccreditation visit team's review, there were 16 areas that required an explanatory response. The Council Show-Cause directive letter, dated September 1, 2106, noted 11 remaining citations such as the institution not keeping adequate records relative to financial administrative operations and the institution not conferring the credential as approved by ACICS.

On September 30, 2016, the US DOE delivered its final determination concerning the Federal Final Audit Report for SOLEX College's administration of selected aspects of the Title IV programs for the 2012-2013 and 2013-2014 academic years. The US DOE determined that SOLEX College had improperly disbursed Pell funds to students enrolled in the intensive English programs or advanced English studies program in the amount of \$3,836,409.38. This amount is to be repaid by November 15, 2016, or appealed. The institution plans to appeal the US DOE decision.

At the completion of the IEP, the campus had awarded a certificate of completion rather than an academic credential. The ACICS approval letter lists this as a "certificate" program, without identifying it as a nonacademic credential. The program has no vocational objectives and the campus provided no placement data for the program.

Page 3 of 17

- B. Describe the institution's organizational and accreditation background (including if there are other branches and learning sites). SOLEX College programs are designed to educate students for technical or occupational careers or to enhance preexisting vocational knowledge. The campus launched operations in 1995 and has been continuously accredited by ACICS since 2009, SOLEX College presented the team with an Illinois Board of Higher Education certificate of approval to operate a private business and vocational school for the time period of June 1, 2015
 - through June 30, 2016. The institution has submitted the necessary documentation and fees to renew their license but claimed the State of Illinois has a 6-month backlog for renewals. The team was provided with all appropriate documentation. The State of Illinois published a disclaimer regarding the backlog on their webpage. The main campus in Wheeling, Illinois, operates a learning site.
- C. Provide a summary of the team's review and impressions (at the visit conclusion). SOLEX College is fully operational with students enrolled in three programs at its main campus and learning site and intends to remain as such. The team was able to conduct a productive two-day unannounced visit. The director of academic affairs and compliance and the institution's president warmly greeted the special visit team and provided all requested documentation timely and allowed access to all SOLEX College personnel as requested. Both viewed the unannounced visit from their accreditor as an asset as they prepare their response to the Show-Cause directive letter dated September 1, 2016. The campus president's primary goal, along with delivery of educational objectives, is for the institution to come into compliance with Accreditation Criteria. It is of note that the visit took place on October 12-13, 2016, and the institution response to the Show-Cause directive is not due until October 31, 2016. Two of the team's three findings are repetitive from the Show-Cause letter dated, September 1, 2016.

The team noted that ACICS approved the Intensive English Program (IEP) as a certificate program. The approval letter does not identify the program as a nonacademic program; however, the program has no vocational objectives and the campus provided no placement data for the program. SOLEX College received a final audit determination letter from the US DOE on September 30, 2016, which found that the ESL programs offered were ineligible for Title IV purposes given these programs were nonacademic. SOLEX College disputes this finding and affirms that Title IV funds were awarded to students who enrolled in the IEP program for the purpose of using their already existing knowledge, training, or skills for gainful employment. The intent was for students to learn English to be productive in a work environment.

The institution's response to the reaccreditation report explains that the program was approved with the classification of certificate as this designation as the only option listed on the program application that fit the program objectives.

The team was provided with a copy of the original approval for an initial grant of accreditation dated December 10, 2009. The program was written to support a nonacademic credential that was intended to serve international students that come to the United States on a F1 Visa who wish to gain proficiency in English. The institution explains that the program was initially approved as a certificate program because the IEP did not fit into any other program classification on the new program application. Further, the campus explains that they have read all memos to the field and *Accreditation Criteria* and have found nothing that relates to a change that might be appropriate for this program. The institution maintains their position that they have always administered the program as approved by the Council.

The institution describes the IEP as a 648-clock hour and 31.5 credit hour program taught over 36 weeks. The program is designed to serve those students who are on a university track and/or wish to acquire an appropriate mix of academic as well as functional English skills that will allow the student to more easily transition into an English-speaking society. At each of the program's first six levels, applications of interpersonal communication provide opportunities for students to build new language skills and reinforce the skills learned in prior levels. Upon successful completion of three levels within the six-level program, the student is eligible for a certificate. Program electives (TOEFL Preparation, American Literature, Business English, American Studies, Academic Writing, and Medical English) allow for flexible entry points based on the skill level of the student. These courses are offered on a rotating basis and are chosen by the student based upon their particular needs and interests. Additionally, SOLEX College submitted a non-substantive program modification application that was approved by ACICS on June 2, 2015, which allowed students to enter the IEP at one of three different levels of proficiency as opposed to two.

The special team agrees with the reaccreditation visit team and the US DOE that the IEP is not an academic program but the special team concludes that SOLEX College is administering the program as it was originally approved. Additionally, SOLEX College changed the verbiage on their transcript from "certificate of completion" to "certificate" in anticipation of responding to the Council's September 1, 2016 letter to comply with the Show-Cause directive letter.

As previously stated, on September 30, 2016, the US DOE delivered its final determination concerning the Federal Final Audit Report for SOLEX College's administration of selected aspects of the Title IV programs for the 2012-2013 and 2013-2014 academic years. The Department determined that SOLEX College had improperly disbursed Pell funds to students enrolled in the IEP or advanced English studies program in the amount of \$3,836,409.38. This amount is to be repaid by November 15, 2016, or appealed. SOLEX College had already retained lawyers and responded to the preliminary audit report. Since the on-site program review by US DOE in June 2104, SOLEX College made the decision to not award any Title IV funds for students in the IEP program while the institution works with the US DOE to resolve the findings of the program review. The institution plans to appeal US DOE decision which will litigate "their clean hands" to the fullest extent of the law if a settlement cannot be reached.

The institution is in the process of developing an institution teach-out plan as directed by the Council in the September 1, 2016, letter and will include said plan in its response due on October 31, 2016. The institution also plans to appear in person before the Council in December 2016 for a Show-Cause hearing. The institution shared they welcome the opportunity for discussion of their intent and efforts to come into compliance with Accreditation Criteria with the Council. The president of SOLEX College discussed the action plan developed to resolve all remaining citations listed on Council's September 1, 2016, letter with the team during the visit. The team was satisfied that that institution is on a corrective trajectory to achieve compliance with Accreditation Criteria in the short term. It is the intention of the owner and president of SOLEX College to remain in operation; they have no plans to close their doors.

2. ORGANIZATIONAL EFFECTIVENESS

- A. Assessment of the administrator's knowledge and ability to effectively lead the campus.
 - i. Who is the on-site administrator? Describe this person's academic and/or experiential qualifications to lead the campus.
 Dr. Leon Linton, owner and president, is the on-site administrator. He holds an EdD degree in organizational leadership from Argosy University, an MBA degree from the Keller Graduate School of Management, and a master's degree in radio frequency engineering from the Minsk Engineering Institute. He founded the institution in September 1995.
 - ii. Summarize the team's observations concerning the on-site administrator's management and oversight of the campus. Is the campus being run effectively to ensure quality of education?

 As noted in the introduction to this report, the team noted upon its arrival a fully functioning campus. The administrative staff was working at their desks and day classes were in session. Schedules for the current term were posted on notice boards and showed enrollment of over 100 students for the day IEP program.

The organizational chart notes the details of both the administrative and academic departments for SOLEX College. The campus president oversees a finance office, admissions office, marketing office, the registrar, and student services office. The director of academic affairs and compliance reports to the president and has oversight of the academic operations of the college. There is a program director for each of the programs that have students enrolled as well as sufficient faculty for classes currently offered.

Dr. Sharon McNeely, director of academic affairs and compliance, was tasked with the oversight of the Wheeling campus the first day of the visit. While many staff members were not on campus for various reasons, Dr. McNeely was able to ensure that all SOLEX College faculty and staff arrived at the campus within two hours of the team's arrival. The team was able to meet with and interview appropriate faculty and staff to complete the report as tasked by the Council. The team was able to ascertain that the campus is being run effectively to ensure quality of education.

- B. Describe the Campus Effectiveness Plan (CEP) and provide a narrative on the evaluation of the six required elements, the specific activities included in the plan, and the evidence of implementation that was reviewed.
 - The CEP provided to the team at the time of the visit was the same CEP reviewed in response the reaccreditation visit team's report from June 2016. A revised CEP is in process as the institution is preparing to respond to the Show-Cause Directive letter dated September 1, 2016. During interviews, the campus president discussed changes planned for the CEP and the institution's intent that the revised CEP will comply with Council standard. As previously noted, the special visit took place on October 12-13, 2016, and the institution's response is not due until October 31, 2016. However, the CEP presented to the special visit team did not include the element of student satisfaction.

(Section 3-1-111): The CEP does not include the element of student satisfaction. The institution conducts course evaluations at the end of each term so the institution can include this required element with ease. The team was able to review course evaluations for the past three years during the visit.

C. Describe the evidence that staff meetings are held and scheduled regularly. Staff meetings are held monthly. The team reviewed the meeting minutes from the June 21, 2016; July 8, 2016; and August 10, 2016; meetings.

3. ADMINISTRATIVE CAPACITY AND CAPABILITY

- A. List the key administrative positions and describe the qualifications of the individuals assigned to each position.
 - The campus president works in conjunction with an admissions director, financial aid director, and a director of academic affairs and compliance to ensure the institution is being run effectively to ensure quality of education. Additionally, there are well-qualified program coordinators administering the academic programs. The qualifications of these key administrative personnel can be found in the appropriate sections of the report.
- B. Faculty and staff's awareness of responsibilities and capacity to carry out said responsibilities.
 - i. Describe the organizational structure. The organizational structure includes the president of the college, who is assisted by an admissions director, financial aid director, and a director of academic affairs and compliance to ensure the institution is being run effectively to ensure quality of education. Additionally, there are well-qualified program coordinators administering the academic programs and faculty to deliver courses.
 - ii. Describe the documentation reviewed that evidences that all faculty and staff are aware of their responsibilities, are appropriately trained and evaluated, and are competent to carry out their responsibilities effectively.

A review of faculty and staff files evidenced signed job descriptions and annual performance reviews. While staff files contained the necessary documentation to evidence that they are aware of their responsibilities, are appropriately trained and evaluated, and are competent to carry out their responsibilities effectively, 18 faculty files were missing necessary documentation as detailed in Section 5 of this report.

C. Are there grievance policies for students and staff? Describe evidence that that the campus has been implementing these policies as published.
The most recent version of the institution's catalog included the grievance policy as required by Council. The team was presented with a copy of the SOLEX College employee handbook that included the grievance policy for SOLEX College employees. Each employee signs a form that they received and read the employee handbook that is placed in their personnel file. A review of staff personnel files evidenced this signed form.

4. STUDENT RELATIONS

A. How many files were reviewed and from which CAR period (i.e. current or most recently ended)? Describe the distribution of the files (active, withdrawals, SAP, drops, graduates, etc.). Describe any discrepancies in the retention rates.

The team reviewed a total of 35 files, 18 of currently enrolled students and 17 from students who were included in the institution's 2015 CAR. Eight of the students from the CAR were graduates, four were withdrawals, and the remaining five were classified as still enrolled at the end of the reporting period. Six of the 35 files reviewed were of four students from the CAR who had been subject to SAP actions and two currently enrolled students who are on SAP probation.

The team's calculation of the institutional retention rate using the ACICS formula confirmed that the rate reported by SOLEX was correct.

B. Describe evidence that the published admissions criteria are appropriate and being followed as written.

SOLEX has an open admissions policy and requires only that an applicant possess a high school diploma or its recognized equivalent and that the applicant meet any special age requirement that his or her chosen program may require. An applicant who will be under the age of 18 by the start of classes must have the prior approval of the administration to begin his or her studies.

The eligibility of international students to study in the US and to apply for admission to SOLEX's academic or English language programs is not included as a part of the admissions criteria. Once this eligibility has been established, the institution's open admissions policy applies equally to international students.

In all of the 35 student files reviewed by the team, proof of high school diplomas or GEDs or attestation of high school completion were present. In the three files where the students had been under the age of 18 at the start of their studies, an administrator had signed off on the admissions acceptance.

C. What are the recruitment policies and procedures?

Admissions representatives follow up by phone on leads received from referrals, from Internet inquiries, from lead generators located outside the US, and from limited advertising that the institution occasionally uses. For potential applicants inside the US, representatives encourage them to visit the chosen campus of SOLEX for a tour of the facilities and for an interview with the admissions representative who provides detailed information about the available programs or the program of interest. If the potential applicant is interested in applying for financial aid, an initial interview with the financial aid officer is also arranged.

If the person decides to apply for admission, he or she completes an admissions application and is informed of what documents must be provided to complete the application process and, if applicable, to apply for financial aid. Once the application process is completed, the applicant receives an enrollment agreement to read, reviews it with the admissions representative, and has the opportunity to ask any questions he or she may have. Once the applicant signs the enrollment agreement, he or she is considered a SOLEX student.

Essentially, the same process is followed for international applicants except for the physical tour and the financial aid interview; the process occurs primarily online.

- i. How are recruitment personnel trained, monitored, and evaluated?

 Before they are allowed to begin any recruitment activities, all new admissions representatives are required to complete formal training by the admissions director on the recruitment policies, procedures, and ethical codes of conduct that the institution has established. Representatives are regularly monitored and closely supervised to ensure that they are adhering to the standards of performance required by SOLEX. The job performance of admissions representatives and of all employees is formally evaluated on an annual basis.
- ii. How do the current students match their current experience with the information provided to them prior to enrollment?

 As previously noted, the team conducted its visit at the Wheeling main campus where nearly all the students were English as a second language (ESL) students whose abilities to communicate in English were limited. Consequently, team interviews with students were not conducted. However, the results of ACICS student surveys, which were available to all SOLEX students and completed by 31 of them, did not reveal any complaints related to the admissions process.

iii. If third party recruiters and lead generators are used, what documentation is used to ensure that the campus trains and monitors their activities?

Although the institution does not use third-party recruiters, it does use lead generators located outside of the US, whose role is to stimulate interest in SOLEX and encourage individuals to contact the institution for information related to the admissions process. The SOLEX president advised the team that he visits each lead generator to screen and assess its suitability to work with SOLEX. He conducts training based on the written manual developed by the institution for the services lead generators are expected to provide. A required training webinar is planned from implementation before the end of the month.

(Section 3-1-412(a)): The institution does not monitor the activities of its lead generators. The SOLEX president stated that, to determine whether lead generators are providing services as contracted, the institution relies on interviews with and surveys of international students upon their arrival regarding their experiences with the lead generators and the information provided by them. The institution does not currently directly monitor or supervise the lead generators.

It should be noted that the institution is presently working to address this issue as part of its response to the ACICS "Show-Cause Directive Letter" dated September 1, 2016. The institutional response is due by October 31, 2016.

- D. Summarize any observations from the institution's last Program Participation Agreement (PPA) audit (if applicable).
 - The team reviewed the institution's "Compliance Audits of Title IV Funds" prepared by the firm of Allan J. Brachman, CPA, LTD for the years ending December 31, 2014, and December 31, 2015. As certified by that firm, there were no findings or questioned costs for either of those years nor, as noted in the 2014 audit, were there any findings for the prior year 2013.
 - i. Summarize the review of ledger cards, refunds, and disbursement process to evaluate that policies are appropriate and being followed.
 Ledger cards were examined for each of the 35 student files reviewed by the team. For each Title IV recipient in that group, the cards clearly reflected the date, amount, and funding source (Pell grant or loan) for each financial aid transaction. Four of the files and ledger cards reviewed were of students who had withdrawn from the institution with one of the four requiring a return of Title IV funds to the US DOE. The team's review of the refund (R2T4) calculation performed to determine the amount of financial aid that needed to be returned found that the calculation was accurate and that the R2T4 amount reflected on the ledger card was correct.
- E. Summarize the review of students on SAP along with the interview of the SAP administrator. What evidence was reviewed to determine that the SAP policies are appropriate and being followed? What evidence is there to determine that students are notified in a timely manner and are afforded the opportunity to appeal, and that they receive academic assistance?

Eighty (80) percent of SOLEX's total enrollment is international students and the institution must follow strict attendance regulations under the Student and Exchange Visitor Program (SEVP) of the U.S. Department of Homeland Security. For that reason, it has two types of satisfactory academic progress standards: one based on attendance and the other based on academic performance. There are specific standards that all students must meet related to attendance and failure of those standards will result in warning, first probation, second probation, or administrative withdrawal. The SAP policy based on academic performance contains all applicable elements, including opportunities for appeal, as required by Appendix D of the *Accreditation Criteria* and has similar statuses for students failing SAP at specific evaluation points.

Students failing an applicable standard under either policy are sent a written notice by the registrar, who uses certified mail with a return receipt requested to do so. The notice details the specific nature of the failure and, in cases other than administrative withdrawal or academic dismissal, informs the student of the necessary steps to remain enrolled. The team's review of files for six students who had failed SAP found that documentation was included for all actions taken by the institution, including timely proofs of mailing for the notices. Documentation of academic assistance provided in efforts to help students regain satisfactory academic progress was also present in the files.

The director of academic affairs and compliance, Dr. McNeely, has overall responsibility for the administration of SAP policies. Dr. McNeely was present on the first day of the visit but, as the only administrator present on the campus when the team arrived, she spent the entire day responding to the team's requests for documents and files. The remainder of the key administrators were attending a previously scheduled meeting to work on a teach-out plan, as required by ACICS in its Show-Cause directive. Dr. McNeely was the administrator designated to remain on campus to ensure appropriate oversight of operations.

Because of a previous commitment to attend a conference in Washington, D.C. the following day, Dr. McNeely was not available to be interviewed on the second day of the visit. The team did conduct a brief interview with the registrar, who works closely with Dr. McNeely in administering and monitoring SAP.

F. Who is assigned to provide employment advising, and what documentation was reviewed to evidence that placement services are being provided (career fairs, resume and interviewing preparation, professional development classes, job posting, etc.)?

Ms. Suzana Simic is the director of career services and works with a staff of career representatives to provide the traditional range of placement services to those students of SOLEX who are legally allowed to work in the US (about 19-20 percent of total enrollment.) Nearly all of those students attend the Chicago (Wabash) campus, where Ms. Simic spends most of her time. There was no opportunity for the team to visit the Chicago campus. However, as noted in Section 7, Data Integrity Review, of this report there was 100 percent verification of all graduates reported as placed on the placement verification form (PVP) submitted to ACICS.

5. EDUCATIONAL AND ACADEMIC QUALITY

- A. Who is assigned to provide administration of all academic programs? Describe the evidence that this individual is academically and/or experientially qualified for the role and has sufficient time and resources to carry out their responsibilities.
 Dr. McNeely is responsible for compliance and academic affairs for the institution. Dr. McNeely holds a PhD in educational psychology, a master's degree in behavioral disabilities general studies, and a bachelor's degree in behavioral disabilities rehabilitation, all from the University of Wisconsin. She has 20 years of experience as an instructor at various institutions.
- B. Explain whether all programs have appropriate administrative oversight. Each program has either an assigned program director or lead instructor.

is the lead instructor for the medical assisting program. has a diploma in medical assisting and EKG tech/phlebotomy from Illinois Medical Training Centers, and a nursing assistant diploma from West Suburban Hospital.

is the ESL program coordinator. He holds a master's degree in TESL from Northeastern Illinois University and a bachelor's degree in English from Illinois State University.

s the physical therapy program director. has worked as a Certified Orthopedic manual therapist and an APTA Credentialed Clinical Instructor. has nearly 10 years of practical physical therapy experience.

- C. Based on interviews, observations, and documentation, summarize the evidence that instructional resources, equipment, and facilities are appropriate and sufficient to meet educational objectives.
 - In its limited observation of classrooms and labs, the team noted that computers and headsets in the several language labs were relatively new and appeared to be working properly for students using them and that classrooms were adequately furnished and very spacious to comfortably accommodate the numbers of students being served. The current student/teacher ratio is 10:1.
- D. Summarize evidence that all faculty members are appropriately qualified (academically and experientially) to teach their assigned courses.

(Section 3-1-303(a): Eighteen faculty files were reviewed during the visit. While all faculty reviewed appeared to be either academically or experientially qualified, most faculty files were missing required documentation; specifically, as follows:

- least property hired September 12, 2016 does not have a signed job description that includes to whom she reports or a professional development plan;
- hired January 5, 2008 has no job description or an annual review;
- hired September of 2015 has no professional development plan or annual evaluation:

- hired July 2016 has no professional development plan, no transcript for a master's degree in linguistics with TESL endorsement;
- hired May 2016 has no professional development plan, job description, and the catalog states that she holds a master's degree in TESL while the transcript states master's degree in linguistics;
- hired January 2015 is missing a transcript for a bachelor's degree in secondary education/TESL, professional development plan has no professional growth activities, and no job description;
- least the professional development plan and no job description;
- hired July 2016 has not professional development plan, no job description, or transcript for a master's degree in TESL;
- hired October 2015 has a foreign transcript evaluation for a bachelor's degree in linguistics, but does not have an official transcript, a job description, or performance evaluation;
- hired December has not specific professional growth activities on her professional development plan, no performance evaluation, and no job description;
- hired September 13, 2016 has no transcript for a bachelor's degree in TESL, professional development plan, or job description;
- has no in-service activities on her professional development plan and no annual performance evaluation;
- hired October 2014, had no in-service activities on her professional development plan and no annual performance evaluation;
- has no professional development plan and no annual performance evaluation;
- has no annual performance evaluation, or professional development plan. The master's degree in linguistics has a transcript evaluation but does not include an official transcript;
- has not professional development plan or annual performance evaluation;
- no faculty development plan, no performance evaluation, and no transcript for master's degree in in TESL;
- no professional development plan nor any performance evaluation;
- faculty development plan has no professional growth activities an no performance evaluation; and
- no professional development plan.

A binder was provided that includes multiple in-service activities and sign-in sheets for the year, but these are not currently listed on the instructors' development plans.

- E. Describe evidence that the institution has adopted appropriate academic policies and the faculty are aware of the policies (academic freedom and academic governance). In its review of the files of 18 currently teaching instructors, the team found signed acknowledgements that faculty had received copies of the institution's academic freedom, grievance, and academic governance policies.
- F. What evidence is there that faculty meetings are documented and regularly scheduled, and that faculty has an active role in the development of curriculum and academic policies?
 The team was able to review the agendas and minutes of approximately 15 recently held faculty meetings as well as the attendance sheets listing the faculty who were present.
- G. Who is assigned to provide oversight of the library resources and what are this person's qualifications? In addition, provide evidence that there is sufficient access to and resources in the library to support the academic programs offered at the institution. At the Wheeling main campus, where the team was on site, there is a library which has a fairly extensive physical collection that includes reference materials and books for all academic and ESL programs offered at the institution. An inventory of the complete collection was provided by the director of academic affairs and compliance. The library is serviced by the director of ESL programs and by lead instructors, each of whom has been trained to provide assistance to students who may need it in finding materials or who may want to check out books. The institution does not have an online library.

6. PUBLICATIONS AND DISCLOSURES

- A. Provide evidence that the catalog contains all items as required by Appendix C. (Section 3-1-701 and Appendix C): The team reviewed the SOLEX College Comprehensive 2016-2017 Catalog updated October 7, 2016. The catalog does not contain a detailed description, application process and qualification for the tuition and fee waiver provided to students as requested in the Show-Cause Directive Letter dated September 1, 2016. The institution lists all faculty in an addendum. The addendum lists the qualifying credential of faculty but does not include the awarding institution. All other requirements of Appendix C were evident. It is of note that the visit took place on October 12-13, 2016, and the institution's response is not due until October 31, 2016.
- B. Provide evidence that all advertising and promotional materials are appropriate and accurately depict the services and operations of the institution.
 Two print publications were provided for two programs; in addition, the campus website was reviewed.
- C. Describe the channels used by the institution for recruitment and promotional purposes.
 Are these sources used appropriately?
 The institution utilizes approximately 30 international lead-generation agents.

A handbook has been developed that outlines the expectations for the agents and includes training materials. There is not current oversight of the agents, but interviews with Dr. Linton indicate that this is being prepared as part of the response that is due to ACICS on October 31, 2016.

D. What information is publicly disclosed as required by ACICS and the U.S. Department of Education? Where is the information disclosed and is it accurate? The institutional website posts the CAR retention, placement, and licensure rates at the institutional and program levels.

7. DATA INTEGRITY REVIEW

- A. Summarize the campus- and program-level retention, placement, and licensure pass rates (where applicable) as submitted on the most recent Campus Accountability Report. The 2015 CAR indicates a campus level retention rate of 88 percent and placement rate of 74 percent. All program level retention rates are above 70 percent with the exception of the basic nursing assistant certificate, which is 69 percent and did not have current enrollment during the time of the visit. All program placement rates are reported above 70 percent with the exception of the medical assistant certificate program, which is 63 percent. Only the basic nursing assistant certificate reports licensure pass rate, which was 91 percent.
 - Are the student achievement outcomes reliably provided to the public?
 As previously stated, the CAR data is provided on the institutional website.
- B. Summarize the results of placement verification to include the number of graduates reported as placed in each program, the number of calls attempted, the number of successful attempts, and the number that confirmed placement (as well as the verification for those graduates classified as not available for placement).

 The campus was required to submit PVP data for January 1-June 30, 2016. This data was used for verification as it is much more current that the 2015 CAR data. The PVP shows a total of seven placements and all were placed based on title or skills. Six of the seven were confirmed by e-mail from the students. One call was placed for the remaining placement. The student number was out of service, but the employer verified that the graduate was placed by title as reported on the PVP.

SUMMARY

Based on the team's review, the following areas require an explanatory response:

Number	r Section Summary Statement	
1	3-1-111	The Campus Effectiveness Plan (CEP) does not
3-1-111		meet Council requirements (page 6).
2 1 202()		Most faculty files reviewed are missing required
2	3-1-303(a)	documentation (pages 11 and 12).
		There is no evidence that third party contractors are
3 3-1-412(a)		supervised and maintain familiarity with the
		campus (page 9).
4	3-1-701 and	The most recent published SOLEX College catalog
4	Appendix C	does not meet Council requirements (page 13).



December 30, 2016

ID CODE 00024422(MC)

VIA E-MAIL AND UPS DELIVERY

Dr. Leon E. Linton Chief Executive Officer SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090 acics@solex.edu

Subject: Renewal of Accreditation - Continued Show-Cause Directive

Dear Dr. Linton:

SOLEX COLLEGE, WHEELING, ILLINOIS WABASH LEARNING SITE, CHICAGO, ILLINOIS

ID CODE 00024422(MC) ID CODE 00267203(LS)

The Council considered the institution's application for a renewal of accreditation, the visit reports, responses, and subsequent testimony provided at the hearing held on December 7, 2016. The institution's application for renewal of accreditation was reviewed by the Council in August 2016 with 16 findings, 12 of which were not satisfactorily addressed and the contents of which cast serious doubt on the overall capacity of the institution, resulting in a show-cause directive action. The Council also reviewed the institution's most recently submitted 2016 Campus Accountability Report and information received from the U.S. Department of Education, as part of its consideration of the show-cause directive. As a result of its review, the Council found the following concerns remain based on the *Accreditation Criteria*:

- 1. The inaccuracies reported in the 2015 and 2016 Campus Accountability Reports (CAR) call into question the integrity of the data reported to ACICS (Section 3-1-203). In response to the original finding, the campus submitted a revised 2015 CAR with back-up documentation to reclassify those graduates as "not placed." However, the 2016 report had a number of inaccuracies and errors which resulted in the reporting of a -3 percent placement rate, due in part to the institution's failure to follow the CAR guidelines as was shared by the institution during its testimony at the hearing. Further, the institution has failed to submit monthly placement information to the ACICS Placement Verification Program (PVP) program as directed by ACICS for the months of July, August, September, and November (only data for the month of October was submitted).
- 2. Inadequate records are being kept to evidence faculty qualifications and professional development (Sections 3-1-303(a), 3-1-543, & 3-1-543). Official transcripts for

qualifying credentials were not on file for all instructors and the faculty development plans did not include appropriate in-service activities to enhance faculty expertise. In response to the finding, the campus submitted copies of transcripts, faculty development plans, and some documentation of professional development. However, this did not meet Council standards because the hundreds of pages of documentation were disorganized, with several documents unsigned, and some documentation still missing or not current.

- 3. There is no evidence that all faculty members are qualified to teach in the Intensive English program (Section 3-2-104(c)). In response to the finding, the institution submitted a narrative identifying a new process that has been implemented to ensure proper record keeping of faculty files. However, as previously noted, the documents submitted were disorganized, some documents were missing, and others were unreadable due to poor print quality.
- 4. Serious concerns remain about whether the institution has the administrative capability and knowledge to comply with student financial aid regulations due to findings outlined in the 2015 Office of the Inspector General (OIG) Report (Section 3-1-434). In response to the finding, the institution submitted a narrative of the timeline of events leading up to the OIG report and their intent to submit an appeal to the findings in the report. However this did not meet Council standards as the matter has not been resolved. Further, there is no evidence of the institution's appeal.
- 5. In its Final Audit Report for the 2012-2013 and 2013-2014 award years, dated September 30, 2016, the Chicago/Denver School Participation Division (SPD) of the U.S. Department of Education, Office of Federal Student Aid, found that the institution is liable for \$3,750,877.18 for awards paid for the 2010-2011 award year to the present, after serious concerns with the IEP and AES programs arose from the initial audit period (funds disbursed to 732 ineligible students in these two programs).

Additionally, in a letter to the institution dated October 21, 2016, the SPD also determined that the institution had failed to meet the standards of financial responsibility, with a composite score of 1.4 (out of 3.0) as stipulated in 34 C.F.R §668.172, Financial Ratios. Hence, the institution, under the Zone Alternative, was directed to either use the Heightened Cash Monitoring (HCM) method of payment or, alternatively, the institution was to provide an irrevocable letter of credit no later than January 9, 2018, in order to continue to maintain its eligibility to participate in Title IV programs as a financially responsible institution. As a result, the Council has concerns as to whether the institution can maintain financial viability to remain operational.

Dr. Leon E. Linton December 30, 2016 Page 3

Council Action

Due to the continued concerns and the significant number of findings, as well as the lack of clear evidence provided to resolve these concerns and findings, the Council directs the institution to continue to show-cause why its application for renewal of accreditation should not be denied or otherwise conditioned during the April 2017 review cycle. The institution must provide the appropriate notification and fee for an in-writing hearing **within ten days of receipt of this notice**. Failure to do so will be considered a deviation from the directives of ACICS and result in a withdrawal by suspension action in accordance with Section 2-3-402 of the *Accreditation Criteria*.

In response to the directive, the institution must submit the following information by **March 1, 2017**:

- 1. A revised 2016 Campus Accountability Report (CAR) that includes all back-up documentation to support the reported placement rates, including evidence that the appropriate fee has been paid and a final CAR summary received. Furthermore, as required by ACICS, the campus must submit the Placement Verification Program (PVP) spreadsheet for the months of January 2016. June 2016 and for all subsequent months through February 2017. The spreadsheet must include every student who was placed during those months. For those months with no placements, such an indication must be submitted.
- 2. Evidence that the institution maintains appropriate documentation of the qualifications and professional development of its faculty. The institution must provide this documentation in the following format: one electronic folder that holds an institutional catalog and a current teaching schedule, along with individual electronic folders for each faculty member. Within each faculty folder, there must be: an audit checklist of all items contained; a copy of signed ACICS data sheet; a signed position description; copies of official transcripts that qualify the faculty member or for credentials that are listed in the catalog; relevant certifications or licensure; a current faculty development plan for the instructor along with documentation of all professional development and in-service activities listed on the plans completed prior to February 15, 2017.
- 3. Evidence that the campus has qualified faculty members to teach each course in the Intensive English Program (IEP). Documentation must be included in the files noted above, specifically labeling those teaching in the IEP program.
- 4. Evidence that the findings detailed in the referenced OIG report have been resolved. The institution must provide a detailed explanation of the changes made to the administration of financial aid as a result of the findings and provide evidence that these changes have

been fully implemented at the institution. The institution must provide copies of all communication to and from the Chicago/Denver School Participation Division (SPD) of the U.S. Department of Education, Office of Federal Student Aid, on a continuing basis within 10 days of submission or receipt, since the OIG report was issued through the date of submission of its response to this letter. Lastly, the institution must submit a quarterly financial report for October – December 2016.

5. Evidence that the findings detailed in the referenced SPD audit report concerning its Title IV liability have been resolved. The institution must provide copies of all communication to and from the SPD and the Department of Education on a continuing basis within 10 days of submission or receipt, since the SPD report was issued through the date of submission of its response to this letter.

The institution must submit all components of its response via upload to the show-cause online application by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

Please contact Ms. Karly Zeigler at (b)(6) @acics.org or (202) 336-6846 if you have any questions.

Sincerely	/,	
(b)(6)		
_		
Dans I	337:11:	

Roger J. Williams Interim President

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)

Mr. Douglas Parrott, U.S. Department of Education, Chicago/Denver School Participation Team- Region V & VIII (douglas.parrott@ed.gov)

Mr. Adam E. Campbell, Illinois Board of Higher Education (b)(6) @ibhe.org)

Ms. Sandra Wise, The Commission on Accreditation in Physical Therapy Education ((b)(6) (a) apta.org)



April 27, 2017

ID CODE 00024422(MC)

VIA E-MAIL AND UPS DELIVERY

acics@solex.edu

Dr. Leon E. Linton Chief Executive Officer SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090

Subject: Renewal of Accreditation - Continue Show-Cause Directive

Dear Dr. Linton:

SOLEX COLLEGE, WHEELING, ILLINOIS WABASH LEARNING SITE, CHICAGO, ILLINOIS

ID CODE 00024422(MC) ID CODE 00267203(LS)

At its April 2017 meeting, the Council considered the institution's response to the continued show-cause directive issued in its letter dated December 30, 2016. As detailed in the correspondence, the show-cause directive was continued as a result of outstanding concerns that were not satisfactorily resolved by the institution's response to the show-cause directive action taken at the Council's August 2016 meeting.

At its August 2016 meeting, the Council reviewed the institution's application for renewal of accreditation. The team's visit report identified 16 findings, 12 of which were not satisfactorily addressed by the institution's response and the contents of which cast serious doubt on the overall administrative and operational capability of the institution. The Council, at that time, directed the institution to show-cause why its application for renewal of accreditation should not be denied.

At its December 2016 meeting, the Council considered the institution's response, in addition to the testimony provided at the hearing held on December 7, 2016, as well as information from the U.S. Department of Education in a letter dated September 30, 2016, and the student achievement outcomes reported on the institution's 2016 Campus Accountability Report (CAR).

As a result of its most recent review at the April 2017 meeting, the Council found the following based on the *Accreditation Criteria*:

1. There is no evidence that the institution enrolls the majority of its students in programs which lead to a postsecondary academic credential or occupational objective (Section 1-2-100(a)).

Dr. Leon E. Linton April 27, 2017 Page 2

The institution's mid-year 2017 CAR and narrative response indicate that the Physical Therapy Assistant program has one remaining student and the Medical Assistant program has 31 students who will complete or graduate before June 2017, with no new enrollees in either program. The Intensive English Program (IEP), which does not lead to a postsecondary academic credential or occupational objective, has over two hundred students.

- Inadequate records are being kept to evidence faculty qualifications (Sections 3-1-303(a), 3-1-541, and 3-1-542). Official transcripts for qualifying credentials were not on file for five of the twenty-five instructors currently on the teaching schedule and one foreign transcript was not evaluated for US equivalency. The campus submitted 30 faculty files, of which 25 were for instructors listed on the teaching schedule. The files included copies of transcripts, the faculty checklists, data sheets, position descriptions, evaluations, and faculty development plans. However, of the twenty-five files, five contained transcripts that were issued to the student, and therefore not official; and the foreign transcript for one instructor had not been evaluated for equivalency.
- Finalized documentation of settlement with the United States Department of Education (DOE) was not available in response to the Council's concerns regarding the institution's financial sustainability. In its Final Audit Report for the 2012-2013 and 2013-2014 award years, dated September 30, 2016, the Chicago/Denver School Participation Division (SPD) of the U.S. Department of Education, Office of Federal Student Aid, found that the institution was liable for \$3,750,877.18 for awards paid for the 2010-2011 award year to the present, after serious concerns with the IEP and AES programs arose from the initial audit period. The campus submitted a settlement proposal and e-mail of acceptance from the DOE regarding the request to settle. However, no official documentation of agreed upon terms of the settlement were presented.

Council Action

Due to the ongoing concerns and lack of sufficient documentation to evidence compliance, the Council directs the institution to continue to show-cause why its application for renewal of accreditation should not be denied or otherwise conditioned during the August 2017 review cycle. Accordingly, the institution's grant of accreditation, which was originally set to expire on December 31, 2016, and was extended through the April 2017 meeting, is now extended through September 5, 2017.

The institution must provide the appropriate notification and fee for an in-writing hearing <u>within</u> ten days of receipt of this notice. Failure to do so may result in a withdrawal by suspension action in accordance with Section 2-3-402 of the *Accreditation Criteria*.

Dr. Leon E. Linton April 27, 2017 Page 3

In response to the directive, the institution must submit the following information by **July 7, 2017**:

- 1. Evidence that the institution enrolls a majority of its students in programs which lead to a postsecondary academic credential or occupational objective. Documentation must include the submission of an unofficial 2017 CAR, for the period of July 1, 2016, through June 30, 2017, along with the back-up documentation to support any retention waivers and new student enrollments for the April 1, 2017, June 30, 2017, cohorts. The institution must also provide detailed enrollment plans and projections for all active programs for the period of June 2017 December 2017.
- 2. Evidence that the institution maintains appropriate documentation of the qualifications of its faculty. The institution must provide this documentation in the following format: one electronic folder that holds an institutional catalog and a current teaching schedule, along with individual electronic folders for each of the following faculty members:

Within each faculty folder, there must be: an audit checklist of all items contained; a signed ACICS data sheet; a signed position description; copies of official transcripts and evaluations of transcripts for foreign credentials (that qualify the faculty member and for credentials that are listed in the catalog; and relevant certifications or licensure.

3. Evidence that the findings detailed in the referenced SPD audit report concerning the institution's Title IV liability have been officially resolved and a final settlement reached. The institution must provide copies of all communication to and from the SPD and the Department of Education, to include the finalized settlement.

The institution must submit all components of its response via upload to the citation documents section of the preexisting online show-cause application by the date indicated above.

Please contact Ms. Karly Zeigler at kzeigler@acics.org or (202) 336-6846 if you have any questions.

Sincerely,	
(b)(6)	
Roger I Williams	

Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Mr. Douglas Parrott, U.S. Department of Education, Chicago/Denver School Participation Team Regions V & VIII (douglas.parrott@ed.gov)
 - Dr. Daniel Cullen, Illinois Board of Higher Education (cullen@ibhe.org)
 - Mr. Louis Farrell, Department of Homeland Security (louis farrell@dhs.gov)
 - Ms. Sandra Wise, The Commission on Accreditation in Physical Therapy Education (sandrawise@apta.org)



August 9, 2017

ID Code 00024422(MC)

VIA E-MAIL AND CERTIFIED MAIL

llinton@solex.edu

Dr. Leon E. Linton Chief Executive Officer SOLEX College 350 E. Dundee Road, Suite 200 Wheeling, IL 60090

SOLEX COLLEGE, WHEELING, ILLINOIS WABASH LEARNING SITE, CHICAGO, ILLINOIS

ID CODE 00024422(MC) ID CODE 00267203(LS)

Subject: Denial of Application for the Renewal of Accreditation

Dear Dr. Linton:

At its August 2017 meeting, the Council considered your institution's application for renewal of accreditation, including the continued show-cause directive, and the institution's response to the areas of non-compliance identified in the Council's letter dated April 27, 2017.

At its August 2016 meeting, the Council reviewed the institution's application for renewal of accreditation. The team's visit report identified 16 findings, 12 of which were not satisfactorily addressed by the institution's response and the contents of which cast serious doubt on the overall administrative and operational capability of the institution. The Council, at that time, directed the institution to show cause why its application for renewal of accreditation should not be denied.

At its December 2016 meeting, the Council continued the show-cause directive, having considered the institution's response, the testimony provided at the hearing held on December 7, 2016, information from the U.S. Department of Education in a letter dated September 30, 2016, and the student achievement outcomes reported on the institution's 2016 Campus Accountability Report (CAR).

At its April 2017 meeting, the Council was particularly concerned that the institution was not enrolling a majority of its students in programs which led to a postsecondary academic credential or occupational objective, a critical component of its eligibility for ACICS accreditation. Based on the information provided in its mid-year 2017 CAR, the Physical Therapy Assistant program had one (1) remaining student; the Medical Assistant program had thirty-one (31) students set to graduate or complete before June 2017; and the Intensive English Program had over two hundred (200) students. The institution was provided with another opportunity to demonstrate its eligibility for accreditation in the Council's April 27, 2017, continued show-cause letter.

750 First Street, NE, Suite 980 • Washington, DC 20002-4223 • t - 202.336.6780 • f - 202.842.2593 • www.acics.org

Dr. Leon E. Linton August 9, 2017 Page 2 of 3

As a result of its review, the Council found the following based on the Accreditation Criteria:

The institution no longer meets ACICS minimum eligibility requirements (Section 1-2-100(a)(d)). The Council found that the institution does not primarily offer "programs designed to educate students for professional, technical, or occupational careers." In its response, the institution indicated that the final student in the physical therapy assistant cohort had graduated, all students in the medical assistant program will soon complete or graduate, and enrollment in either program will not be reinitiated until the show-cause directive is cleared. However, the Intensive English Program (IEP) will continue to be offered. With students enrolled only in the IEP program, the institution does not enroll "a majority of its students in one or more programs, the content of which is on a postsecondary academic level and which leads to a postsecondary academic credential or an occupational objective" as stipulated by the Accreditation Criteria.

Council Action

Because no evidence has been provided that there is enrollment in any career-related program, the campus is not eligible for accreditation by ACICS. Therefore, the Council acted to deny the institution's application for a renewal of accreditation.

The institution has the right to appeal this decision to the Review Board of Appeals. The Council must be notified within ten (10) business days of receipt of this notice if the institution desires to appeal this decision to the Review Board. The appeal notification must include payment of \$10,000.00. The Council's decision is final if the appeal notice and appropriate fee are not provided within ten business days of your receipt of this notice. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then more detailed appeal procedures and information will be forwarded to the institution.

If the institution elects not to appeal this action, the institution must submit any comments regarding this decision to the Council office within two weeks of the date of this letter. Should the institution choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

Current Grant Expired December 31, 2016

The institution is advised that its grant of accreditation expired on **December 31, 2016**. Though, should the institution elect to appeal the decision and remit the appropriate fee by the established deadline, the grant of accreditation will be extended through September 5, 2017.

Institutional Teach-Out Plan

Finally, if the institution exercises its appeal rights, in compliance with Section 2-2-303 of the Accreditation Criteria, the institution is directed to provide the Council with an Institutional Teach-Out Plan, utilizing the online Institutional Teach-Out Plan application in the ACICS Member Center. This Institutional Teach-Out Plan must be completed as part of the institution's intent to appeal the denial of accreditation action.

The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner. The institution is advised that Section 2-3-900 of the ACICS Accreditation Criteria stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

Please contact Ms. Cathy Kouko at (b)(6)	@acics.org or (202) 336-6790 if you have any
questions.	

Sincerely,	
(b)(6)	
Michelle Edwards	
President	

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)

Mr. Douglas Parrott, U.S. Department of Education, Chicago/Denver School Participation Team - Regions V & VIII (douglas.parrott@ed.gov)

Dr. Daniel Cullen, Illinois Board of Higher Education (cullen@ibhe.org)

Ms. Rachel E. Canty, Department of Homeland Security (Rachel.E.Canty@ice.dhs.gov)

Ms. Sandra Wise, The Commission on Accreditation in Physical Therapy Education (sandrawise@apta.org)

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-161

AT-RISK INSTITUTIONS' GROUP (ARIG) EXTERNAL INFORMATION REVIEW DECEMBER 2017

<u>Open External Information Review:</u> 5 cases External Information Under Additional Review: 1 case

Open External Information Review:

Career Education Corporation - NY & FL Offices of Attorneys General / USDOE

Summary of Issues:

While submitting documents for a subpoena issued by the New York Attorney General's office, Career Education Corporation (CEC) reported findings of improper placement practices at some of its campuses. They launched an internal investigation to try and discover how the practices affected their reported placement rates. Meanwhile, state investigations were also initiated in Florida and Illinois. All of the State Attorney General activity is based on verification that the schools have not violated various consumer protection laws in the state. The states have subpoenaed documents relating to marketing, advertising, recruitment, placement and student outcomes.

The state initiated investigations led to an inquiry from the Chicago/ Denver School Participation Team of the USDOE, requesting copies of all subpoenaed documents and all adverse information responses.

ACICS was notified that ACCSC opened adverse against their CEC schools and asked for a response to the issues. Subsequently, ten campuses of CEC were show-caused by ACCSC, citing the integrity of their placement practices and employment data.

December 2016 Status:

- A summary of CEC's meeting with the representatives of the Multi-State AGs along with any communication from, and to, the AGs concerning the civil investigative demand of whether CEC and its schools have complied with certain state consumer protection laws.
- 2. Evidence that each CEC institution has applied for recertification with the USDOE SFA given their current provisional status. Further, given that the approval is currently provisional, a summary of the current teach-out schedule for the institutions must be provided along with a narrative on the contingency plan if the USDOE does not approve the recertification by December 31, 2016.

 Additional information on the Federal Trade Commission's investigation into the institutions' advertising, marketing or sales. This should include any requests from the FTC and the institutions' response.

In its response to the request, the institution provided the following:

1. The Multi-State Attorney General Investigation:

A copy of the except in its 10Q, for the quarter ending September 30th concerning the civil investigative demands and subpoenas of these 18 Attorney Generals with Connecticut serving as the lead in this investigation. The summary was very general and the same as was previously submitted to ACICS. However, a draft copy of a confidential settlement with the AGs, dated September 16, 2016, was also shared with ACICS to demonstrate the company's intent to resolve the matter in an expeditious manner.

2. Recertification Status with the U.S. Department of Education (USDOE):

Evidence the campuses application for recertification with the USDOE SFA was submitted by the deadline along with affirmation (as outlined in the SFA Handbook) that the campuses will remain eligible for Title IV while the USDE completes its review of these applications. Hence it is not concerned about losing eligibility to participate. However, its contingency plan would include the consideration of self-funding, waiving tuition for remaining Title IV students, or appealing the Department's decision. According to the must current Teach-Out schedule provided (11.29.16), the last campuses would complete the teach-out in April 2018 and are Sanford-Brown College Seattle and Sanford-Brown College Tampa. ARIG confirmed the company's smooth and organized closure of a number of campuses to date and notes the good faith effort to ensure the best for students. Enrollment ceased in August 2015 upon announcement of the teach-out plan.

3. Federal Trade Commission Investigation (FTC):

Since its original request in 2015, the FTC has not provided or contacted the corporation concerning its civil investigative demand. According to the institutional representatives, on a conference call and in its response, the only interaction with the FTC has been through legal counsel on the scope and timing of the request. A copy of the CID was provided to ACICS along with the public disclosure of this investigation in the company's 10Q.

April 2017 Status:

1. The Multi-State Attorney General Investigation:

CEC provided its most recent public update on this investigation by submitting a portion of the Securities and Exchange Commission's "Form 10-K" for the year ending in December 31, 2016, that was filed with the Securities and Exchange Commission on February 23, 2017. There was no substantial updated information included

2. Recertification Status with the U.S. Department of Education (USDOE): CEC's ten main campuses accredited by ACICS applied for approval of continued participation in Title IV programs (recertification) before the September 30, 2016, deadline. Since that time, two main campuses have completed teach-outs, leaving eight remaining campuses. CEC will not seek other accreditation for their ACICS-accredited campuses, as the teach out of these campus is expected to be completed prior to the June 12, 2018 expiration of the provisional participation agreements issued by the USDOE to ACICS-accredited institutions.

3. Federal Trade Commission Investigation (FTC):

CEC reported that there have been no meetings or discussions with the FTC since their last update provided to ACICS in December 2016. The only contact has been by CEC's outside counsel whose conversations have been limited to the scope, timing and order of providing the information requested.

August 2017 Status:

The institution provided updates regarding the following on-going adverse information; however, there have been no substantial updates:

1. The Multi-State Attorney General Investigation:

CEC provided its most recent public update on this investigation by submitting a portion of the Securities and Exchange Commission's "Form 10Q" for the quarter ending on March 31, 2017, that was filed with the Securities and Exchange Commission on May 3, 2017. There was no substantial updated information included

2. Recertification Status with the U.S. Department of Education (USDOE): CEC's ten main campuses accredited by ACICS applied for approval of continued participation in Title IV programs (recertification) before the September 30, 2016, deadline. Since that time, four main campuses have completed teach-outs, leaving six remaining campuses. CEC will not seek other accreditation for their ACICS-accredited campuses, as the teach out of these campus is expected to be completed prior to the June 12, 2018 expiration of the provisional participation agreements issued by the USDOE to ACICS-accredited institutions.

3. Federal Trade Commission Investigation (FTC):

CEC reported that there have been no meetings or discussions with the FTC since their last substantial update provided to ACICS in December 2016.

December 2017 Status:

CEC provided a report regarding the following on-going adverse information; however, there have been no substantial updates. It is noted that the corporation has successful closed all its Le Cordon Bleu campuses and is finishing up the teach-out of the Sanford Brown brand.

1. The Multi-State Attorney General Investigation:

CEC provided its most recent public update on this investigation by submitting a portion of the Securities and Exchange Commission's "Form 10Q" for the quarter ending on September 30, 2017, that was filed with the Securities and Exchange Commission on November 2, 2017. There was no substantial information, apart from what has been previously provided, included in its report.

- 2. Recertification Status with the U.S. Department of Education (USDOE):
 Only one main campus remains to complete its teach-out, which is anticipated to be concluded no later than June 12, 2018. All other ACICS-accredited institutions owned by CEC have closed.
- 3. Federal Trade Commission Investigation (FTC):
 CEC reported that there have been no meetings or discussions with the FTC since their last substantial update provided to ACICS in December 2016.
- 2. American National University (formerly known as National College) Kentucky Attorney General's Office

Summary of Issues:

The Kentucky Attorney General's launched an investigation into Daymar Colleges in that state, citing misrepresentation, admission of students not meeting requirement, falsification of grades etc. They also launched an investigation into National College, citing misrepresentation of placement rates based on a calculation that National was using on their website. (2012)

December 2016 Status:

According to the update provided by American National University, discovery disputes have slowed the process with both parties filing motions to compel. There was an original trial date set for October 10 – 17, 2016 but that had to be rescheduled as a result of the August 25, 2016 hearing during which the Court extended the discovery process. A status conference has been set for January 18, 2017 at which time the Court will evaluate the progress made to determine the need for continued discovery or to set a trial date. Finally, the Judge who considered the case on August 25 has since announced his retirement and a new judge has not yet been appointed.

April 2017 Status:

According to the update provided by American National University, the case is still in the discovery phase. The institution reported that at the January 18, 2017 status conference, additional discovery issues were discussed and an additional status conference was scheduled for May 31, 2017. A new judge was appointed to fill the vacancy which will be created by the August 2017 retirement of the current judge hearing the case. The necessity for the new judge to update themselves on the litigation will possibly delay the proceedings. The institution anticipates the trial date to be set in early to mid-2018.

August 2017 Status:

According to the update provided by American National University, the case is still in the discovery phase of the litigation and an extended deadline for discovery is not September 1, 2017. The parties are negotiating scheduling of additional depositions but the institution anticipates that there will be no further extensions of the discovery deadline; the trial is currently set for January 8, 2018. A hearing was held on July 19, 2017 to consider several pre-trial motions. One motion was granted with the effect of limiting damages and three others are pending the court's decision.

December 2017 Status:

According to the update provided by American National University, the case is scheduled for trial from January 8, 2018 – January 19, 2018. The institution noted that the Court has determined that the AG is not entitled to a jury trial in the matter so that it would be only be heard by the judge. Several additional motions are pending, including partial summary judgment which, if granted, would further alter the shape of the litigation at trial.

Conclusion: ARIG will continue to monitor the ANU case, requiring an immediate response following the trial, as soon as it becomes available.

3. Harris College of Business/Premiere Education Group - NY Times, Linwood, NJ

Summary of Issue:

News media reports from February 2014 described litigation filed against Harris College of Business by former employees contending that school officials "routinely misled students about their career prospects, and falsified records to enroll them and keep them enrolled." The complaint is an amended version of a qui tam / False Claims Act lawsuit brought by the same individuals in 2011 but undisclosed publically. After formal investigations, both Federal and State prosecutors declined to prosecute the allegations under federal and state whistle blower statutes. The individuals then decided to pursue litigation through civil action, which prompted the public disclosure and coverage by the news media. (2014)

April 2016 Status:

Harris School of Business continues to contest the appeal of the former favorable court decision by the state of New Jersey. One of the key issues will be argued in front of the New Jersey Supreme Court in April. The institution noted that the state Department of Justice had declined to intervene in the matter after reviewing the allegations and numerous documents.

December 2016 Status:

A response from the institution's legal counsel outlined the current status of the case before the Courts.

April 2017 Status:

The institution's response indicated that on February 11, 2017, the parties submitted supplemental briefs to the court, but no further action has been taken in the case by either party or the court.

August 2017 Status:

The institution has not received any communication or deadlines from the court and is awaiting the court's decision regarding the supplemental briefings referenced in previous updates.

December 2017 Status:

No follow up information has been received from the institution.

Conclusion: ARIG will continue to monitor the Harris College of Business/Premier Education Group case, taking into consideration other risk factors.

4. Spencerian College - Attorney General of Kentucky, Louisville & Lexington

Summary of Issues:

The Attorney General of Kentucky has filed a lawsuit claiming that Spencerian College violated the Kentucky Consumer Protection Act, by providing unfair, false, misleading and deceptive information to consumers about job placement rates, graduation success and Spencerian operations in general. Specifically the complaint alleges discrepancies between placement rates reported to ACICS and those advertised by Spencerian. (2013)

April 2016 Status:

Litigation continues to be in the discovery stage. Spencerian College has submitted answers to Interrogatories and well over 100,000 documents in response to requests. Counsel for the College and the AG's Office continue discuss certain discovery issues with respect to the applicability of FERPA regulations to certain documents/data requested. The FERPA issues have been narrowed, and notifications have been sent to Spencerian graduates. There remain, however, additional discovery issues with FERPA implications which have not been resolved.

December 2016 Status:

In its letter dated November 28th to Mr. William's request for information on November 22nd, the institution asserts its resolve to defend the lawsuit and to deny the claims that it violated Consumer Protection laws. The communication was similar to the report previously submitted to ACICS concerning the information provided to the AG and the discovery stages of the litigation.

April 2017 Status:

The institution reported that there are no updates and the litigation against them is still in the discovery stage despite submitting over 100,000 documents in response to the Requests for Production of Documents filed by the Kentucky Attorney General.

August 2017 Status:

The campus stated that they have received no additional information or updates from the court.

December 2017 Status:

No follow up information has been received from the institution. However, ACICS received information from ABHES that the institution updated initial accreditation at its November 2017 meeting.

Conclusion: ARIG will continue to monitor the Spencerian College case, pending receipt of their formal notice of withdrawal.

5. Brightwood College - KGNS, Laredo, TX

Summary of Issues:

On July 24, 2017, news media outlet, KGNS reported in the form of a television news segment and an online article that Brightwood College's Laredo, Texas campus defrauded students and had a former employee and student attest to this in an interview. The former employee worked for campus in 2014 – 2015 when it was called Kaplan College and vacated his position prior to Kaplan College's change of ownership to Brightwood College. The segment and article also mentions a former student named Leticia who made claims that the campus did not help her find a job and stated that she is not working in her field credential. The campus responded by stating that they comply with state requirements and provide performance information to incoming students, along with providing documentation to the Texas Workforce Commission, and claims to the contrary are without merit.

Conclusion:

Following the review of the institution's response, it was determined that the media outlet failed to identify critical information about the student "Leticia" and the lack of assistance received from the institution in obtaining a job. Signed documentation was also provided to evidence Leticia was on a maternity placement waiver at the time of her graduation. The case has been closed.

External Information Under Additional Review:

1. California University of Management and Sciences – Former Staff Lawsuit, Anaheim, CA – Renewal of accreditation review took place in the winter 2017 cycle with 13 findings identified between the main campus in California and the branch in Virginia. The campus was placed on compliance warning and currently has 5 remaining findings.

In September 2017, the institution's president, Dr. David Park, informed ACICS that the BPPE had formally filed an Accusation against the institution to which it was

responding. Soon thereafter, after speaking with BPPE Agent, Karen Johnson about the Accusation, an onsite review was facilitated by Ms. Michelle Edwards, ACICS President, and Dr. Judee Timm, ACICS Commissioner. The team's report, which had no findings, is being added as a supplement to the institution's outstanding compliance warning action for its renewal of accreditation review. The Accusation will be reviewed in court in January, as shared by Ms. Johnson.

Appendix A

Summary of On-site Evaluations Initiated by ARIG in Fall 2017

School ID	Institution Name	Visit Location	Visit Start Date	Reason for Visit	Current Status
				Onsite investigation following	
	California University of			receipt of formal Accusation	Compliance Warning
00021311	Management and Sciences	Anaheim, CA	10.10.17	from BPPE	as a result of RA
				Council-directed because of a	
				show-cause directive for	Institution withdrew
				failing to host the team in	its accreditation the
00240224	PCCTI Healthcare	Oakbrook, IL	09.06.17	Spring 2017.	day before the visit.
				Quality assurance review in	
				lieu of a full renewal due the	
	Branford Hall Career			campus's planned 2018	
00012823	Institut e	Windsor, CT	10.02.17	closure.	



May 21, 2018 ID Code 00010934(MC)

VIA EMAIL ONLY

ACICSerie@edaff.com

Mr. Peter Correa Campus President Fortis Institute 5757 West 26th Street Erie, PA 16506

Subject: Special Visit Review

Dear Mr. Correa:

The At-Risk Institution Group (ARIG) directed an investigative visit to your institution to evaluate its overall administrative and academic effectiveness, as a result of a number of serious allegations made in two complaints.

At its December 2016 meeting, the Council considered the team's report along the institution's response to the three findings and determined that it did not address two of the concerns, resulting in a deferred action, as detailed in the action letter dated, December 21, 2016. At its April 2017 meeting, the Council considered the institution's response to the outstanding issues and is now satisfied that the academic concerns have been appropriately resolved.

Therefore, the investigation has been closed and no additional information is required from the institution. The institution is advised that this case has been made a part of its permanent file. This material and all other information accumulated through the accreditation process will be reviewed by the Council when considering a new grant of accreditation for the institution.

Please contact Ms. Jan Chambers at jchambers@acics.org or if you have any questions.

Sincerely,

Roger J. Williams Interim President

c: Ms. Patricia Landis, Pennsylvania Division of Private Licensed Schools (plandis@pa.gov)



January 30, 2018

Evaluation Team Report - SPECIAL VISIT REPORT

ID for Campus Visited: 00010934

Main Campus ID: 00010934

Staff Contact: Ms. Cathy Kouko – Phone: (202) 336-6790 Application ID: 74527

VISIT RESPONSE DUE DATE: February 13, 2018

Mr. Brian Parker Campus President Fortis Institute 5757 West 26th Street Erie, PA 16506 ACICSerie@edaff.com

Dear Mr. Parker:

A copy of the report prepared by the Council's evaluation team that recently visited your institution is attached. The Council invites you to respond to this report before it takes formal action on your institution's application for accreditation. Please submit your response to the findings in the report via your online application under "Citations." The Council offers the institution ten business days to formally respond to the report; therefore, your response should be uploaded by the date indicated above.

We look forward to receiving your response. You will be notified in writing of the Council's decision following its next meeting.

Visit Response

Your response should pertain to the findings notated in the report or letter. The following information provides suggestions for developing your response. Please include information on any significant changes that have taken place at the institution since the site visit.

Web-Based Submission of Campus Response

ACICS has implemented a web-based submission process for all visit responses. The response to each finding must be uploaded under the application ID number associated with the visit (this is noted on the cover page of the team report). Each finding must include a narrative and supporting documentation (if applicable). If supporting documentation covers more than one finding, the campus is required to duplicate the documentation and upload it in each finding. Submission of a current catalog need only be uploaded once and only if referenced in the response. If you have any questions, please send your inquiry to Linda Lundberg at llundberg@acics.org.

Process:

Once the campus logs on to the ACICS membership website, go to the "In Process Applications" heading, select the application name and ID. The campus will then click either "Citation Documents" and upload each response document as described below. (Please see the attached "Preparing the Institutional Response" for step-by-step visual instructions on how to upload your response into your institution's Member Center Account.)

IMPORTANT: Document Labels

The institution may name the document any appropriate file name. However, each document must be labeled with the corresponding 'Document Type.'

Example: The document uploaded to satisfy the:

Finding 1 Narrative task must be labeled 1st Cite -Narrative.

If a campus needs to submit multiple pieces of information to support one citation response, this information should be combined into one document prior to uploading. Note: There is no maximum size for documents, but larger documents may take some time to upload. If you are uploading PDF documents, save them as reduced size PDF documents.

Response Tasks

Below is the format for how the listing of "Document Type" will appear once the document is uploaded. Each visit type will have a standard amount of visit *Response* tasks. Upload your response document and label each one accordingly. Ignore tasks that exceed your response requirement.

1st Cite - Narrative

1st Cite - Supporting Document

2nd Cite - Narrative

2nd Cite - Supporting Document

3rd Cite - Narrative

3rd Cite - Supporting Document

Responses should be professional in appearance. The responses should be paginated and well-organized to ensure a complete and sufficient review.

Sincerely,



Linda J. Lundberg
Accreditation Content Editor

Accreditation and Institutional Development

Attachments



SPECIAL VISIT REPORT

CAMPUS FORTIS INSTITUTE 5757 West 26th Street Erie, PA 16506 ACICS ID Code: 00010934

Mr. Brian Parker, Campus President (bparker@fortisinstitute.edu)
(ACICSerie@edaff.com)

https://www.fortis.edu/campuses/pennsylvania/erie/5757-west-26th-street-erie-pa.aspx

January 18, 2018

Ms. Bobbijo Pinnelli Educational Activities Immaculata University Malvern, PA
Generalist

Ms. Cathy Kouko Staff Representative ACICS Washington, D.C.

1. VISIT CONTEXT - INTRODUCTION

- A. Provide a summary and reason(s) for the visit including assessment of risk, Council directive, external factors, complaints, and/or student achievement outcomes (retention, placement, or licensure, etc.). ACICS received a detailed complaint on December 29, 2017, alleging that Fortis Institute, Erie, was violating the *Accreditation Criteria* standards. Due to the serious nature of the complaint, the ACICS At-Risk Institutions Group (ARIG) directed an unannounced visit to review administrative effectiveness, faculty qualifications, student and faculty files, instructional supplies and equipment, and availability of student, staff, and faculty grievance policies with documented adherence.
- B. Describe the institution's organizational and accreditation background (including if there are other branches and learning sites).

In 1984, Tri-State Computer Institute was founded by Burt R. Euliano. Its sole purpose was to train its students for entry-level careers. Tri-State Computer Institute enhanced its program offerings to include career training in the fields of medical, legal, accounting, and marketing and thus changed its name to Tri-State Business Institute. In July 2011, Tri-State Business Institute changed the institution name to "Fortis Institute." Fortis Institute is owned and operated by Education Affiliates, Inc., which has schools and colleges in 17 states.

Fortis Institute has been accredited by ACICS since 1990 and offers occupational associate's degree and diploma programs. The dental hygiene program is programmatically accredited by the Commission on Dental Accreditation.

C. Provide a summary of the team's review and impressions.

The team was warmly received by the institution. Mr. Parker, campus president and interim director of education, set up a private area and provided a tour of the entire campus, which comprises several buildings. Mr. Parker ensured the team received all requested items and arranged for interviews with faculty, staff, and program administrators. The team interviewed students in each program throughout the day as well.

It was evident to the team that Mr. Parker had endeared himself to the institution within the short period of time he had been there. Collectively, the program administrators, faculty, staff, and students spoke of his approachability and ability as the on-site administrator.

The team was impressed with Mr. Parker's knowledge of the institution as well as the respect and admiration he received from the school body. It is the team's belief that when the position of director of education is filled, the academic programs will greatly benefit; and Mr. Parker will have sufficient time to concentrate on the administration of the institution.

2. ORGANIZATIONAL EFFECTIVENESS

- A. Assessment of the administrator's knowledge and ability to effectively lead campus
 - Who is the on-site administrator? Describe their academic and/or experiential qualifications to lead the campus.
 - Mr. Brian Parker currently serves as both the campus president and interim director of education for the campus. He holds a bachelor of science in business administration from Bowling Green

University. Mr. Parker joined Fortis Institute, Erie, in October 2017. Prior to this role Mr. Parker was the president of The Art Institute of Vancouver from June 2012 to June 2017. He has more than 20 years of experience in admission and sales, most of which is in leadership roles.

- ii. Summarize the team's observations concerning the on-site administrator's management and oversight at the campus. Based on the team's review, is the campus being run effectively to assure quality in education?
 - The team observed the on-site administrator, Mr. Parker, engaged in a variety of management activities on campus; and he demonstrated a thorough knowledge of day-to-day operations and processes despite his relatively new presence. Interviews with faculty, staff, students, and other administrators indicated the campus is being run effectively to assure the quality of education. Overall, the campus was happy and content with Mr. Parker's leadership. For example, students expressed they felt more valued by the activities he planned, which acknowledged their successes. Faculty and staff expressed they felt the campus was moving in a positive direction; and students, faculty, and staff expressed they felt supported and encouraged by him. There was a general consensus that Mr. Parker's leadership has improved the overall conditions at the campus.
- B. Describe the evidence that staff meetings are held and scheduled regularly, policies and procedures are systematic and followed as written.

The team reviewed meetings minutes, agendas, and sign-in sheets for staff meetings that have been held. The team evidenced that meetings are held regularly departmentally. In addition, Mr. Parker holds all-school meetings that are attended by both staff and faculty.

3. ADMINISTRATIVE CAPACITY AND CAPABILITY

A. What are the key administrative positions and describe the qualifications of the individuals assigned to these positions.

The key administrative positions and the qualifications of the individuals assigned are as follows:

- Ms. Margo Devers-Senior serves as the campus registrar and has been with the institute since 2006. She has over 10 years of experience in administrative and project management. Ms. Devers-Senior holds a paralegal degree from Tri-State Business Institute.
- Ms. Deborah Budney serves as the director of nursing and has been with the institute since 2006.
 She has more than 30 years of experience in the medical fields. She holds an academic associate's in nursing from Excelsior College; a bachelor's in nursing, and a master's in nursing, both from American Sentinel University. Ms. Budney is currently working on a second master's in nursing from Capella University. She is licensed by the State of PA Nursing Board.
- Ms. Jacquelyn Goodman serves as the chair for the dental programs. She has been with the
 institute since March 2006. Ms. Goodman earned an occupational associate's in dental laboratory
 technology from Columbus Community College. She holds an expanded function dental assistant
 license from the Pennsylvania Board of Dentistry, and a radiology certificate from the State of
 Pennsylvania. Ms. Goodman's prior roles include teaching, management, and technician.
- Ms. Danette Shafer serves as the dental hygiene program director. She has been with the institute since 2007. Ms. Shafer holds an occupational associate's degree in applied science from Lakeside

Community College, and a bachelor's degree in dental hygiene from the College of Technology at Pennsylvania State University (Penn State).

- Mr. James Wright serves as the department chair for skilled trades and has been with the institute since 2015. He holds an academic associate's degree in architectural drafting and design from Triangle Tech and is EPA 608 Tract Pipe certified. Mr. Wright has more than 25 years of experience in HVAC and construction.
- Ms. Brenda Hadden serves as the welding program director and has been with the institute since 2006. She holds an occupational associate's in welding & fabrication technology, and a diploma in welding technology, both from Tri-State Business Institute and certificates of tests and qualifications of welding operator. Ms. Hadden has more than 10 years of experience in the welding field.
- Mr. Rausaan Powell serves as the department chair for the business and legal programs. He holds
 a bachelor's in business administration from Duquesne University, and a MBA from Gannon
 University. He has been with the institute in his current role since 2012. Mr. Powell's prior roles
 include positions in behavioral therapy, administration, and retail.
- Mr. Steve Luzier serves as the department chair for computer information systems and trades. He is also the campus information technology officer. He has been with the institute since 2005. Prior to this role, he worked in the business and management field. He holds an academic associate's in website development & management from Tri-State Business School as well as several Microsoft Office certifications. Mr. Luzier is currently working on a bachelor of science in information technology and security from Western Governors University.
- Ms. Elizabeth Geanous serves as the library resource center technician for the campus. She has been with the institute since 1993. Ms. Geanous holds a bachelor's degree in accounting from Penn State. Prior to joining Fortis, she worked as an accountant.
- Ms. Barbara Borgeson serves as the director of admissions for the campus. She has been with the
 institute since 2005. Ms. Borgeson holds a bachelor's degree in communications and a master's
 in counseling from Edinboro University.
- Mr. John Zaczyk serves as the director of career services for the campus. Has been with the
 institution since 2015. Mr. Zaczyk holds a bachelor of science in business from West Virginia
 University. He also holds a bachelor's in business management from Penn State.
- Mr. Marc Grutkowski serves as the director of financial aid. He has been with the institute since
 2010. Mr. Grutkowski has a bachelor's in finance from Penn State.
- Ms. Aldina Sabic serves as the chair of hourly programs (cosmetology) and has been with the
 institute since 2008. She is licensed by the State Board of Cosmetology as a cosmetology
 operator and instructor. Ms. Sabic holds an occupational associate's in cosmetology education &
 salon management from Tri-State Business Institute.

- B. Faculty and staff's awareness of responsibilities and capacity to carry out said responsibilities.
 - The institution provided their organizational chart to the team. The directors of nursing, admissions, career services, financial aid, and facilities; department chairs of medical assisting, dental programs, skilled trades, business/legal, computer information systems, and hourly program; dental hygiene program director, IT director, registrar, and office manager all report directly to the campus president. The welding program director reports to the skilled trades department chair. Program administrative assistants, faculty, and office staff members report to their respective department chairs/directors/program directors.
 - ii. Is there evidence that all faculty and staff are aware of their responsibilities, appropriately trained and evaluated, and competent to carry out their responsibilities effectively?
 Each faculty and staff file had a current signed job description indicating to whom they report, a completed ACICS data sheet, a resume, and appropriate job evaluations. The faculty development plans contained an appropriate selection of in-service and professional growth activities with evidence of completion. In addition, official transcripts of qualifying credentials were available for each faculty member.
- C. Are there grievance policies for students and staff? Describe evidence that the campus has been implementing these policies as published.

The grievance policy for students is outlined in the catalog provided upon enrollment. The catalog is also available online on the institution's website. Students in various points of their enrollment indicated during interviews they knew the steps available to them as outlined in the grievance policy.

The grievance policy for faculty and staff is outlined in the faculty and staff handbook provided at hiring, and via e-mail with each update. This is also available to them in an online format. During interviews, faculty and staff indicated they knew where to locate the grievance policy and described preliminary steps of the process.

The institution also provided documentation various grievances that have been formally recorded. The documentation evidenced that the institution is following its grievance policies as published.

4. STUDENT RELATIONS

A. Describe evidence that the published admissions criteria are being followed as written and are appropriate.

The team reviewed 11 student files from the program offerings as listed below. The files contained all documentation required for admissions per the general admissions criteria outlined in the catalog as well as additional requirements for each program. Each file contained a checklist signed off on by the admissions team as documents were received and filed.

- Practical Nursing 1
- Welding & Fabrication Technology 1
- Construction Management 2

- Medical Assisting 2
- Computer Information Systems/Networking 1
- Business Administration/Marketing & Management 3
- Dental Assisting 1
- B. Summarize any findings identified in the institution's most recent Program Review. The institution had not undergone a recent program review.
- C. Who is assigned to provide employment advising and what documentation was reviewed to evidence that placement services are being provided (career fairs, resume and interviewing preparation, professional development classes, job posting, etc.)?

Employment advising is provided by the career services department, which is comprised of three employees: Mr. John Zaczyk, director of career services, and career services advisors Ms. Destiny Carter and Ms. Sandra Peirson. The team interviewed Mr. Zaczyk and reviewed evidence that the department holds workshops in classes, meets new students within the first two weeks of classes, sets up one-on-one meetings with students, and holds quarterly mini-career fairs on campus. For example, 1) A career services advisor held a workshop in January on interview skills, 2) H & R block was at the campus hiring part-time employees for the tax season the day before the visit, 3) Five employers had confirmed attendance at a career fair scheduled for February.

The department works with students throughout the program to write and update their resume. During a student's last or second to last term, career services helps them do a final resume and hold mock interviews.

The department is available to graduates of their programs indefinitely, as long as a graduate requires assistance; they offer their assistance regardless of graduation date. Mr. Zaczyk provided an example of a gentleman who had graduated from the institution eight years earlier, who had called recently to request assistance, and they were working with him to find employment.

5. EDUCATIONAL AND ACADEMIC QUALITY

A. Who is assigned to provide administration of all academic programs? Is there evidence that this individual is academically and/or experientially qualified for the role and has sufficient time and resources to carry out their responsibilities?

As previously noted, the director of education position has been vacant since March of 2017. Mr. Parker is currently serving as both the president and interim director of education for the campus.

(Section 3-1-511): The campus director does not have sufficient time to administer all academic programs. Interviews with Mr. Parker, program chairs, program directors, and a review of Mr. Parker's file indicates he does not have sufficient time to serve as the on-site administrator and oversee all academic programming. Filling the director of education position will enable Mr. Parker to be fully available for the administration of the campus. At the time of the visit, the position was being advertised.

- B. Describe the evidence that all programs have appropriate administrative oversight. Each program has a program director and/or department chair who reports to the campus director. A review of the program administrator files evidence appropriate credentials and sufficient time to administer the programs.
- C. Based on interviews, observations, and documentation, summarize the evidence that instructional resources, equipment, and facilities are appropriate and sufficient to meet educational objectives. The team found each program provided sufficient resources, equipment, and facilities to meet educational objectives stated. For example, the nursing program presented ample supplies and several simulation laboratories for students to practice scenarios. The criminal justice program also provided a series of complete law reference books and access to online databases for research. The networking program had access to up-to-date equipment and software that accompanied their textbooks. The skilled trade programs provided the necessary equipment and supplies to train students.

Interviews with students and faculty evidence the appropriateness and sufficiency of the instructional resources, equipment, and facilities. They indicated that whenever a need arose, they knew to whom to make a request and the materials would be provided in a timely manner.

- D. Summarize evidence that all faculty members are appropriately qualified (academically and experientially) to teach their assigned courses.
 - A review of faculty files evidenced faculty members were appropriately qualified and experienced to teach their assigned courses. Faculty files were well organized and contained appropriate ACIS data sheets, signed job descriptions indicating to whom they report, official transcripts of all qualifying credentials, course and performance evaluations, resume, and faculty development plans that listed appropriate in-service and professional growth activities as well as evidence of completion.
- E. Describe the evidence that all faculty members have current and individualized faculty development plans on file. Further, that there is evidence that they are aware of academic policies that have been adopted (academic freedom and academic governance).
 As previously stated, each faculty file contained appropriate faculty development plans that listed appropriate in-service and professional growth activities as well as evidence of completion. Each file had a signed attestation that the faculty had received the academic freedom and academic governance policies.
- F. What evidence is there that faculty meetings are documented and regularly scheduled and that faculty has an active role in the development of curriculum and academic policies?
 The team reviewed meetings minutes, agendas, and sign-in sheets for faculty meetings that have been held. They evidenced that they are held regularly departmentally by the program directors and/or departmental chairs. In addition, Mr. Parker holds all school meetings that are attended by both staff and faculty.

Faculty attested that they participate in the development of the curriculum and academic policies. They felt that their input was appreciated and considered.

- G. Who is assigned to provide oversight of the library resources? Provide evidence that the assigned individual has appropriate academic and/or experiential qualifications to oversee the library and also maintains professional development in the field.
 - Ms. Elizabeth Geanous serves as the library resource center technician for the campus. As previously stated, she has been with the institute since 1993. Ms. Geanous holds a bachelor's degree in accounting from Penn State University. Prior to joining Fortis, she worked as an accountant.
 - Ms. Geanous's file evidenced that she maintains professional development in the field. On November 9, 2017, she reviewed a webinar that was presented in February 21, 2017, on Emerging Tech Trends Part 6. In addition, she completed a basic notary education course in October 2017 given by the Blue Desk Notary Education resulting in a certificate of notary education, which is valid for six months.
- H. Summarize interviews with students/faculty/staff on their general satisfaction with the institution's resources, services, and programs.

Faculty and staff indicated during interviews contentment with the institution's resources, services, and programs. Program directors and department chairs expressed they had oversight over their budgets and could purchase supplies to support student learning as was necessary. They also expressed the current leadership provided additional support should a need exceed their current budgets. For example, the skills trades department needed a large trailer to build a mini-home, and administration approved the purchase.

Interviews with staff indicated they felt equally supported and expressed if they asked for something they generally received it. Students expressed the same regarding their requests.

Some nursing students indicated they would like to have a medical terminology course to aid in their learning. Further investigation revealed students receive a medical terminology self-paced guide before the anatomy and physiology course to prepare them in their studies. Several students expressed this was sufficient in acquiring a foundation of the terminology. Furthermore, the NCLEX-PN published pass rates for the institution for the period covering October 1, 2016 – September 30, 2017, was 100 percent.

Interviews with the campus president and program administrators showed there were issues with a vendor in the past and the campus terminated their services. Students across the programs expressed previous issues with textbook arrival and applauded their instructors, whom they said supplemented their learning with loaner books or modified the course outline to other subject areas until the books came in. One instructor noted they keep extra texts on hand and loan them to students in such cases.

Overall, students, faculty, and staff indicated during interviews satisfaction with the institution's resources, services, and programs and felt they were supported.

SUMMARY

Based on the team's review, the following areas require an explanatory response:

Number	Section	Summary Statement
1	Section 3-1-511	The campus director does not have sufficient time to
		administer all academic programs (page 6).



May 21, 2018 ID Code 00010934(MC)

VIA EMAIL ONLY

ACICSerie@edaff.com

Mr. Peter Correa Campus President Fortis Institute 5757 West 26th Street Erie, PA 16506

Subject: Special Visit Review

Dear Mr. Correa:

The At-Risk Institution Group (ARIG) directed an investigative visit to your institution to evaluate the recruitment and admissions practices of students from American College of Commerce and Technology, as alleged in complaints received from your current students.

At its April 2018 meeting, the Council considered the team's report which did not identify any findings and is satisfied that the institution's practices are appropriate and in compliance with applicable standards.

Therefore, the investigation has been closed and no additional information is required from the institution. The institution is advised that this case has been made a part of its permanent file. This material and all other information accumulated through the accreditation process will be reviewed by the Council when considering a new grant of accreditation for the institution.

Please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org or if you have any questions.

Sincerely,

Michelle Edwards President

c: Sylvia Rosa Casanova, SCHEV



January 22, 2018

Special Visit Report

ID for Campus Visited: 00019411

Main Campus ID: 00019411

Staff Contact: Ms. Perliter Walters-Gilliam - Phone: (202) 336-6769

Application ID: 74526

Dr. Valarie Trimarchi Campus President Stratford University 7777 Leesburg Pike, Suite 100-S Falls Church, VA 22043 acicsfallschurch@stratford.edu

Dear Dr. Trimarchi:

I have enclosed a copy of the evaluation report prepared by the Council's evaluation team that recently visited your institution. The team report constitutes only one element in the accrediting process. The application, the institution's response to the team's report, the financial data submitted by the institution, and all other factors which have a bearing on accreditation, are also considered.

You will be notified in writing of the Council's decision following its next meeting.

Please contact Ms. Perliter Walters-Gilliam at (202) 336-6769 if you have any questions.

Sincerely,

(b)(6)

Linda J. Lundberg Accreditation Content Editor Accreditation and Institutional Development



SPECIAL VISIT REPORT

CAMPUS

Stratford University 7777 Leesburg Pike, Suite 100-S Falls Church, VA 22043 ACICS ID Code: 00019411

January 11, 2018

Michelle Edwards Staff Representative ACICS Washington, D.C.

PROGRAMS OFFERED BY

STRATFORD UNIVERSITY FALLS CHURCH, VA

			Enroll:
CREDENTIAL EARNED	ACICS CREDENTIAL	APPROVED PROGRAM TITLE	Full-time/ Part-time
Bachelor's Degree	Bachelor's Degree	Accounting	2/11
Master's Degree	Master's Degree	Accounting	3/4
Academic Associate's Degree	Academic Associate's Degree	Business Administration	4/19
Master's Degree	Master's Degree	Business Administration	15/16
Bachelor's Degree	Bachelor's Degree	Business Administration	13/31
Certificate	Certificate	Certificate of Advanced Business Research	N/A
Certificate	Certificate	Certificate of Advanced Studies in Business Futures	6
Certificate	Certificate	Certificate of Advanced Studies in Enterprise Architecture	4
Certificate	Certificate	Certificate of Advanced Technology Research	N/A
Bachelor's Degree	Bachelor's Degree	Culinary Management	N/A
Master's Degree	Master's Degree	Cyber Security	11/6
Doctoral Degree	Doctoral Degree	Doctor of Business Administration	1
Doctoral Degree	Doctoral Degree	Doctor of Information Technology	2
Master's Degree	Master's Degree	Enterprise Business Management	N/A
Master's Degree	Master's Degree	Entrepreneurial Management	0/1
Bachelor's Degree	Bachelor's Degree	Health Information Management	2/13
Bachelor's Degree	Bachelor's Degree	Health Sciences	11/43
Bachelor's Degree	Bachelor's Degree	Healthcare Administration	18/48
Master's Degree	Master's Degree	Healthcare Administration	9/3
Bachelor's Degree	Bachelor's Degree	Hospitality Management	0/19
Academic Associate's Degree	Academic Associate's Degree	Hotel and Restaurant Management	1/9
Master's Degree	Master's Degree	Information Systems	21/9
Bachelor's Degree	Bachelor's Degree	Information Technology	11/20
Master's Degree	Master's Degree	International Hospitality Management	0/5
Master's Degree	Master's Degree	International Master of Business Administration	6/6
Master's Degree	Master's Degree	Master of Science in Cyber Security Leadership and Policy	0/1

Master's Degree	Master's Degree	Master of Science in Digital Forensics	N/A
Academic Associate's Degree	Academic Associate's Degree	Medical Assisting	3/11
Diploma	Diploma	Medical Assisting	N/A
Academic Associate's Degree	Academic Associate's Degree	Medical Insurance Billing and Coding	1/74
Academic Associate's Degree	Academic Associate's Degree	Network Management and Security	0/6
Master's Degree	Master's Degree	Networking and Telecommunications	5/5
Bachelor's Degree	Bachelor's Degree	Nursing	33/67
Bachelor's Degree	Bachelor's Degree	Nursing (Accelerated)	0/1
Academic Associate's Degree	Academic Associate's Degree	Pharmacy Technician	0/3
Master's Degree	Master's Degree	Software Engineering	6/6
Diploma	Diploma	Stratford Language Institute	7
TOTAL			632

1. VISIT CONTEXT - INTRODUCTION

A. Provide a summary and reason(s) for the visit including assessment of risk, Council directive, external factors, complaints, and/or student achievement outcomes (retention, placement, or licensure, etc.).

Having received both formal and informal complaints from students attending Stratford University that the institution is charging less tuition per class to students who transfer in from American College of Commerce and Technology (ACCT), the ACICS At-Risk Institutions Group (ARIG) directed an unannounced visit to the University to investigate. The complaints further alleged that these transfer students are receiving waivers for six classes to enroll into a master's degree program. Finally, the complaints allege that students were told if they "...brought 4-5 students from ACCT, they would not be charged any tuition." Consequently, the visit is intended to broadly evaluate all critical areas of recruitment, admissions, and transfer of credit as referenced in the complaints.

B. Describe the institution's organizational and accreditation background.

The institution was established in 1976 and incorporated in the State of Virginia as a public benefit corporation governed by its Board of Trustees. Stratford University has been an ACICS-accredited member since 2002. Stratford University is exempt from certification by the State Council of Higher Education for Virginia (SCHEV) to operate campuses in Virginia, as it has been properly accredited by an accrediting body recognized by the U.S. Department of Education for more than 10 years. Stratford is also approved by The Maryland Higher Education Commission (MHEC).

The institution has branches in New Delhi, India; Baltimore, MD; Alexandria, VA; Glen Allen, VA; Newport News, VA; Virginia Beach, VA; Woodbridge, VA; and a learning site in Washington, DC. The main campus, in Falls Church, VA, is 53,000 square feet and located near Tyson's Corner in Falls Church, VA. There are classrooms located on four floors and appropriate office space for all necessary staff and faculty.

The most recent grant of accreditation was awarded in 2014 and expires on December 31, 2019.

C. Provide a summary of the team's review and impressions.

The ACICS staff representative was greeted warmly by the front desk staff and directed to the education department, where the associate dean welcomed the staff prior to an introduction to Dr. James Flaggert, vice president for accreditation & licensure for the corporation. After brief introductions and discussion regarding the reason for the visit, Dr. Flaggert introduced the team to key personnel and the campus president, Dr. Valarie Trimarchi. Dr. Trimarchi provided a private work area for the staff representative and was available throughout the day as she and her team provided documents, participated in interviews with the team, and answered any questions that were asked of them.

Files requested were provided to the team and contained the requested unofficial transcripts and ledger cards, both of which were printed while the team was on site.

All students, faculty, and staff that the team met were pleased with the educational environment offered by the institution.

2. ORGANIZATIONAL EFFECTIVENESS

- A. Assessment of the administrator's knowledge and ability to effectively lead campus
 - Who is the on-site administrator? Describe their academic and/or experiential qualifications to lead the campus.

Dr. Valarie Trimarchi has been in the role of campus president since September 2016. Prior to joining Stratford University, Dr. Trimarchi earned a bachelor's degree in history and a master's degree in adult and continuing education and teaching, both from Indiana University of Pennsylvania, and a doctoral degree in adult and continuing education administration from Penn State University. She also completed the management development program at Harvard University.

ii. Summarize the team's observations concerning the on-site administrator's management and oversight at the campus. Based on the team's review, is the campus being run effectively to assure quality in education?

As previously stated, Dr. Trimarchi is the campus president and on-site administrator for the Falls Church campus. Visits with key staff and observation of her interactions with faculty and students were very positive. She has worked in higher education in both public and private institutions, and her vast experience is evident and qualifies her in the role of campus president. She described the campus-wide meeting schedule to demonstrate her oversight of all departments. While on site, the team observed Dr. Trimarchi's management style and is confident the campus is being run effectively to assure quality in education.

3. ADMINISTRATIVE CAPACITY AND CAPABILITY

A. Describe the organizational structure

All of the managers of various departments such as admissions, student financial services, career services and student support, international student office, and program leads and directors for the various schools report to Dr. Trimarchi, who oversees approximately 15 direct reports and a total of 65 faculty and staff.

4. STUDENT RELATIONS

A. How many files were reviewed? Describe the distribution of the files (active, withdrawals, SAP, drops, graduates, etc.)

The team sampled 25 files while on site to evidence compliance with all applicable standards. Files reviewed included active students, active students with transfer credits from other institutions, and active students who had previously attended the institution (drops and graduates). The team was also able to see evidence of withdrawals and details regarding Satisfactory Academic Progress (SAP) in the files requested. The files were found to be well-organized and no issues of non-compliance were identified. All the documents required for admission per the institutional catalog were documented in each file reviewed.

B. Describe evidence that the published admissions criteria are being followed as written and are appropriate. Is it explicit in the catalog?

As previously stated, the team reviewed 25 student files. All files, across a number of programs for both the undergraduate and graduate level, contained all the requirements for admission as referenced in the 2016-2017 institutional catalog and addenda dated September 8, 2017, and January 5, 2018.

C. What is the transfer of credit policy? Summarize evidence that the institution is following its policy in all instances of transfer students' acceptance.

The transfer credit policy is clearly and explicitly detailed on pages 30-32 of the institution's catalog. As previously stated, 25 files were reviewed, including the institution's implementation of its transfer of credit policy. At least 50 percent of the files reviewed contained evidence of transfer credit. In each case, the team found official transcripts from previous institutions and a written evaluation with a class-for-class comparison as to what courses were awarded as transfer credit. Each instance reviewed contained documented evidence that the institution is following their stated transfer of credit policy.

D. Does the institution offer scholarships? Summarize evidence that the criteria are published and accurate?

The institution currently discloses the offering of two scholarships in its catalog: High School Senior Scholarship Program and Stratford First Scholarship. The documentation regarding the scholarships contains all of the required criteria per ACICS standards. While on site the team was unable to view scholarship student files as there were no current students who had been awarded such scholarships. The institution stated during the visit that they are preparing to publish a new catalog and that they are making changes to the scholarship programs.

E. Describe the recruitment process? Who is responsible for the oversight of recruitment activities? How are recruitment personnel trained, monitored, and evaluated? If third party recruiters and lead generators are used, are there contracts on file that ensure that the campus trains and monitors their activities?

Recruitment at the institution begins with leads that are generated from several sources, including the following: institutional website, community events, walk-ins, referrals, Facebook, phone calls, and advertising. The team reviewed the external marketing materials and determined they were truthful in the representation of the institution and its programs.

Ms. Nadia Baker is the director of admissions at the campus and has been in this role since April 2016. Prior to joining Stratford University, she garnered eight years of experience as both a director and an admissions officer with Westwood College. Ms. Baker earned a bachelor's degree in business administration with a focus in management from Strayer University.

The institution also uses a lead generator service, Zeta Interactive, to provide leads to the institution for follow up. The service does not recruit or admit students; therefore, no contract is necessary. The institution does not utilize any third-party contractors. All leads are followed up by an admissions staff of four.

All admissions officers receive one-on-one training starting with an internal success manual designed by the institution to orient and train all admissions officers. Admissions staff participates in ongoing training both at the institutional and corporate level. Additionally, the staff must complete two Max Knowledge trainings per year and participate in an annual admissions boot camp. The admissions director works individually with her staff to observe in-person interviews, as well as review phone calls, as they are all recorded.

F. Summarize interviews with the leadership concerning its recruitment of students displaced by the closing of the American College of Commerce and Technology?

Interviews with leadership indicated that Stratford University has not enrolled any students displaced by the closing of the American College of Commerce and Technology (ACCT). Additionally, a review of student files did not evidence students that had previously attended ACCT.

SUMMARY

Based on the team's review, there are no areas requiring additional information.



January 30, 2018

Evaluation Team Report - SPECIAL VISIT REPORT

ID for Campus Visited: 00051218

Main Campus ID: 00051218

Staff Contact: Ms. Perliter Walters-Gilliam - Phone: (202) 336-6769

Application ID: 74525

VISIT RESPONSE DUE DATE: February 13, 2018

Dr. Hasan Karaburk
Executive Vice President
iGlobal University
8133 Leesburg Pike, Suites #230 - 240
Vienna, VA 22182
ceo.acics@igu.edu

Dear Dr. Karaburk:

A copy of the report prepared by the Council's evaluation team that recently visited your institution is attached. The Council invites you to respond to this report before it takes formal action on your institution's application for accreditation. Please submit your response to the findings in the report via your online application under "Citations." The Council offers the institution ten business days to formally respond to the report; therefore, your response should be uploaded by the date indicated above.

We look forward to receiving your response. You will be notified in writing of the Council's decision following its next meeting.

Visit Response

Your response should pertain to the findings notated in the report or letter. The following information provides suggestions for developing your response. Please include information on any significant changes that have taken place at the institution since the site visit.

Web-Based Submission of Campus Response

ACICS has implemented a web-based submission process for all visit responses. The response to each finding must be uploaded under the application ID number associated with the visit (this is noted on the cover page of the team report). Each finding must include a narrative and supporting documentation (if applicable). If supporting documentation covers more than one finding, the campus is required to duplicate the documentation and upload it in each finding. Submission of a current catalog need only be uploaded once and only if referenced in the response. If you have any questions, please send your inquiry to Linda Lundberg at llundberg@acics.org.

Process:

Once the campus logs on to the ACICS membership website, go to the "In Process Applications" heading, select the application name and ID. The campus will then click either "Citation Documents" and upload each response document as described below. (Please see the attached "Preparing the Institutional Response" for step-by-step visual instructions on how to upload your response into your institution's Member Center Account.)

IMPORTANT: Document Labels

The institution may name the document any appropriate file name. However, each document must be labeled with the corresponding 'Document Type.'

Example: The document uploaded to satisfy the:

Finding 1 Narrative task must be labeled 1st Cite -Narrative.

If a campus needs to submit multiple pieces of information to support one citation response, this information should be combined into one document prior to uploading. Note: There is no maximum size for documents, but larger documents may take some time to upload. If you are uploading PDF documents, save them as reduced size PDF documents.

Response Tasks

Below is the format for how the listing of "Document Type" will appear once the document is uploaded. Each visit type will have a standard amount of visit *Response* tasks. Upload your response document and label each one accordingly. Ignore tasks that exceed your response requirement.

1st Cite - Narrative

1st Cite - Supporting Document

2nd Cite - Narrative

2nd Cite - Supporting Document

3rd Cite - Narrative

3rd Cite - Supporting Document

Responses should be professional in appearance. The responses should be paginated and well-organized to ensure a complete and sufficient review.

Sincerely,	
(b)(6)	

Linda J. Lundberg Accreditation Content Editor Accreditation and Institutional Development

Attachments



SPECIAL VISIT REPORT

CAMPUS

iGlobal University 8133 Leesburg Pike Suites #230 - 240 Vienna, VA 22182

ACICS ID Code: 00051218

Dr. Hasan Karaburk, Executive Vice President (b)(6) @yahoo.com)
(ceo.acics@igu.edu)

www.igu.edu

January 10, 2018

Perliter Walters-Gilliam Staff Representative ACICS Washington, D.C.

Cathy Kouko Staff Observer ACICS Washington, D.C.

1. VISIT CONTEXT - INTRODUCTION

A. Provide a summary and reason(s) for the visit including assessment of risk, Council directive, external factors, complaints, and/or student achievement outcomes (retention, placement, or licensure, etc.).

ACICS received formal and informal complaints from students and other interested parties concerning the acceptance, by the institution, of students displaced by the closing of the American College of Commerce and Technology (ACCT) in Fairfax, VA. According to the complaints, students who transferred from ACCT were paying less tuition than they (currently enrolled students) were paying for the same courses and that students were able to transfer all courses previously attempted at ACCT, regardless of the percentage of total program length. Following its review, the At-Risk Institutions Group (ARIG) noted that iGlobal University had not sought ACICS's review and approval of any agreement with ACCT to facilitate its closure and that an on-site review was necessary to investigate the allegations.

B. Describe the institution's organizational and accreditation background (including if there are other branches and learning sites).

The institution is a one-campus institution, which was previously located in Annandale, Virginia. The institution, under the leadership of Dr. David Sohn, was founded in February 2008 and conducted its last accreditation evaluation in 2015. It received a four-year grant, which will expire on December 31, 2019.

C. Provide a summary of the team's review and impressions.

Dr. Hasan Karaburk, executive vice president, serves as the on-site administrator and he interacted with the team throughout the review. Dr. Karaburk asserts that the institution is caught in the middle of trying to remain compliant with ACICS requirements while modifying its practices to meet the expectations of the other agency through which it has had to seek accreditation to maintain its approval for SEVIS and state agencies. The team also worked with the campus registrar and director of operations, Dr. Shane Cho, who was very helpful in providing access to student records and answering any questions.

As will be detailed below, the team identified a number of areas in need of additional information based on the practices observed as documented by the institution. It was concerning to the team that the institution appears to be accepting all credits previously earned from ACCT and other institutions with little documentation to evidence a systematic process of quality review. It was further concerning to the team that "scholarships" were being awarded as tuition discounts and referral fees paid to students who brought in additional students.

2. STUDENT RELATIONS

A. How many files were reviewed? Describe the distribution of the files (active, withdrawals, SAP, drops, graduates, etc.)

The team selected a total of 28 files from the 2017 Campus Accountability Report (CAR) and from an electronic student listing in the institution's *Populi* student management system. Of the 28 files, 20 were selected from the list of currently enrolled students, 2 were for withdrawn students, and 6 were graduate files.

B. Describe evidence that the published admissions criteria are being followed as written and are appropriate. Is it explicit in the catalog?

The admissions criteria are explicit in the catalog on pages 23-24 and based on the team's review of sample files, are being followed as written. However, admissions staff are referred to as admissions advisors in the catalog, organizational chart, and elsewhere (Section 3-1-412(d)).

C. What is the transfer of credit policy? Summarize evidence that the institution is following its policy in all instances of transfer students' acceptance.

The institution's transfer of credit of policy as stated in the catalog reads:

Transfer students must meet the admission requirements in effect at the time of matriculation and must comply with the same admission procedures for each selected educational program as mentioned above. However, each and every course considered for transfer must be compatible to a course offered for the same program of IGU with respect to the following, but not limited to: course title, course description and the number of credit hours. In recommendation of the Admissions Committee, the Academic Dean approves or disapproves transfer of credit for any course after a thorough and rigorous course-by-course evaluation.

A student shall complete a minimum of 50% of course work at IGU in order to be granted a bachelor's degree from IGU. At the bachelor's level, the maximum number of transfer credits for students is 50% of the program.

The majority of credits required for a master degree program must be completed at IGU.

TC can be awarded for courses with a "C" grade (4.00 scale) or above for undergraduate courses and with a letter grade "B" for graduate courses. Courses that are of a technical nature must have been completed within a recent time period (less than 7 years) to be considered for a TC award. Applicable courses taken for credit at international/foreign institutions must be evaluated by an approved Credential Evaluation Agency before a TC award can be considered.

All international initial, returning and transfer-in students are required to complete a minimum one quarter at IGU before becoming eligible for transfer-out to another institution. A request for transfer-out must be submitted before the first day of classes.

The bachelor's degree is 180 quarter credits and the master's degree is 54 quarter credits. Following a review of a sampling of student files, the team makes the following observations:

with an expected completion date of January 1, 2022. She transferred 112.50 credits from ACCT and is currently taking 13.50 credits in the winter 2018 term. In addition to receiving credit for more than 50 percent of her completed coursework, she also received transfer credit for MAT310 Descriptive Statistics to satisfy IT205 Numerical Analysis.

(b)(6)

He

transferred 67.50 credits and is currently taking 13.50. He received credit for FIN200 Financial Management to satisfy BUS210 Principles of Management; FIN100 Introduction to Finance AND

for a basic preparatory course, ENG020 Improve Composition.	– received college credit College Reading Skills, to satisfy ENG101 English
	2 Accounting Information System was accepted for counting for MBA521Managerial Accounting; and Law and Ethics.
(b)(6) received credit for M International Marketing, but students Orkhon Tser Tasmukanova received credit for the same course	
Operations Management; and MBA515 IT for Ma	A511 Leadership & Management based on MGT5180 nagers based on MGT5460 Business Intelligence.
	l credit for IT601 IT and Organizational Sustainability MBA521 Managerial Accounting based on ACC500 gers based on CIS500 Management of Information
Business Technology and Management; MBA521	11 Leadership & Management based on CIS570 E- Managerial Accounting based on FIN500 Advanced rational Sustainability based on CIS500 Management
MTH151 Math for Liberal Arts I (The general pur appreciation for the uses of mathematics in the con	redit, received credit for MAT101 Algebra based on rpose of this course is to give the student an intemporary world and to develop ability by the student il manner); and ENG102 Critical Writing based on
(b)(6) — received creMGT550 Project Management.	edit for MBA511 Leadership & Management based or
	60 Total Quality Management based on Human ondon); for MGT311 Engineering Management based or MGT355 Entrepreneurship and Small Business
based on CIS150 Intro Networking.	received credit for IT101 Introduction to Computers

(b)(6)	- received credit for IT101 Introduction to Computers based on
HCM300 Intro to Health Inf	formatics; BUS201 Business Communication based on BUS100 Introduction
to Business; HUM101 Worl	d Religion and Cultures based on HUM200 Logic (accepted for Philosophy
elsewhere); and SOC101 Int	roduction to Sociology based on COM100 Leadership, Strategy, and
Communication.	
G. V. Z.	
(b)(6)	received credit for MBA521 Managerial Accounting based on
ACC500 Financial Account	ing; and MBA515 IT for Managers based on AC502 Accounting
Information Systems.	
(h) (e)	
(b)(6)	- received credit for MAT101 Algebra based on MAT002
Elementary Algebra.	

The team was unable to speak with the dean, who is recorded as the sole individual responsible for the review and approval of transfer credits upon submission by Dr. Cho to the *Populi* system. Instead, Dr. Karaburk shared that it is rather a team effort but was unable to provide the documentation to support the rationale for these credits that were accepted.

(Section 3-1-303(a)): There is no evidence that accurate records are maintained relative to students' academic records. The recording of course numbers in the system to reflect the acceptance of transfer of credit needs to be evaluated and explained. As noted above, BUS100 is recorded as both Introduction to Business and Introduction to Finance. Students receive transfer of credit for the same course using different courses in transfer, and two unique courses were used to satisfy the requirement for the same course for the same student.

(Section 3-1-413): There is no evidence of a systematic process for the evaluation and approval of credit for transfer. The team is gravely concerned that credits are being accepted without a quality review that includes oversight to ensure equity and consistency. The list above is a short list of all the students who received credit for courses being transferred in from various institutions. Further, in some cases, students have transferred about 70 percent of their courses, which contradicts the institution's stated policy and ACICS requirements for graduate degrees (Sections 3-6-603).

D. Does the institution offer scholarships? Summarize evidence that the criteria published and accurate?

The institution offers five scholarships as detailed on page 29 of its 2018 catalog, which include:

-First Country Scholarship (Two students have received it.)

-Life-Long Learning (L3) Scholarship

-Academic Merit Scholarship

-Scholarship for Military Personnel, Veterans, and Dependents

-U.S. Employer Matching Scholarship (up to 50 percent)

The team reviewed ledger cards and student files for those students reviewed for transfer of credit. The scholarships awarded to students do not match up to the five scholarships listed in the catalog. (Sections 3-1-431(b), 3-1-701, and Appendix C). Further, while there were meeting minutes that

showed the scholarships approved (with varying amounts) or denied, there were no applications or discussion on the review of these applications, consistent with the criteria outlined in the catalog. The student files did not include scholarship applications to support the awards noted on their ledger cards. Instead of the actual scholarships being awarded, ledger cards only noted "10% scholarship," "20 scholarship," which was confirmed by the finance manager.

Dr. Cho shared that some students received almost full scholarships when the programs were just starting to build enrollment and as such, are legacy programs. Similarly, some students who are also staff members (including staff Wasley and Zola), have received a 100 percent "Lifelong Learning Scholarship," but the criteria state that scholarship is up to a 50 percent award.

Many transfer students received, but not consistently, a \$500/class "scholarship." This scholarship, which is really a discount, is not disclosed in the catalog. However, Dr. Karaburk explained it to be the current interpretation of the U.S. Employer Matching Scholarship, which will be "revised" to include institutions. Consequently, the institution is offering an unpublished scholarship. Further, there is evidence that ACCT students have also received a "referral fee" for referring other ACCT students to the University. This referral fee is reflected on the ledger cards. Dr. Karaburk again asserts that this was an old practice; however, these transactions are fairly recent.

There is also reference to an ESL to MB scholarship on ledger cards; but this scholarship is not disclosed in the catalog, with no details on how it is awarded, to whom, and based on what criteria.

- E. Are tuition and fees clearly disclosed in the catalog and is there evidence that they are applied consistently to all similarly circumstanced students?
 - (Sections 3-1-432(a), 3-1-701, and Appendix C): It is not evident that tuition and fees are clearly disclosed in the catalog or that they are consistently applied. As previously noted in the section detailing scholarship awards and disbursements, some students received discounts on tuition and others, admitted at the same time, did not receive discounts.
- F. What are the recruitment policies and procedures? How is responsible for the oversight of recruitment activities? How are recruitment personnel trained, monitored, and evaluated? If third party recruiters and lead generators are used, are there contracts on file that ensure that the campus trains and monitors their activities?
 - There is only one marketing/recruitment manager, Ms. Milica Mitic, who reports directly to Dr. Karaburk. Extensive training was conducted in 2017 in preparation for the institution's application with ACCSC. As of June 30, 2017, all third-party recruitment contracts were frozen because of ACCSC's position on the matter, according to Dr. Karaburk.
- G. Summarize interviews with the leadership concerning its recruitment of students displaced by the closing of the American College of Commerce and Technology.
 - Dr. Karaburk, as the on-site administrator, was asked directly if the institution was working with ACCT to facilitate the transfer of students given the \$500/class scholarships, the 50 percent discounts, the \$500/\$200 referral for bachelor's and master's/ESL, respectively, and other accommodations seemingly

made for these students. He stated that there is no agreement and no targeted strategy to recruit ACCT students, even though between 50 and 60 students have transferred to the University.

3. EDUCATION ACTIVITIES

During its review of the programs to evaluate the implementation of the transfer of credit policy, the team noted that one course, listed as general education, IT101 Introduction to Computers (4.5 credits), is required in the bachelor's degrees in information technology and business administration programs. However, as outlined in the Glossary of Definitions in the *Accreditation Criteria*, this course does not meet the requirement for general education but is listed as one of the general education courses required for the BSIT and BBA programs (Section 3-5-202). As a result, the bachelor's degree programs do not have a minimum of 54 general education quarter credits (see page 59 of the catalog). Without the computer course, the programs include 49.5 quarter credit hours of general education.

Further, a review of the programs approved by ACICS determined that the ESL program is not fully disclosed in the catalog as approved, to include all required elements (Section 3-1-701 and Appendix C).

SUMMARY

Based on the team's review, the following areas require an explanatory response:

Number	Section		
1.	3-1-303(a)		
2.	3-1-412(d)	Enrollment personnel (admissions) are called advisors (page 3).	
3.	3-1-413 and 3-6-603	There is no evidence that credits are accepted for transfer based on a systematic method of evaluation, which includes awarding transfer credit to satisfy current course requirements (pages 3-5).	
4.	3-1-431(b), 3-1-701, and Appendix C	All institutionally financed scholarships are not described in the catalog, and ledger cards include scholarships that are not aligned with those published (pages 5 and 6).	
5.	3-1-432(a), 3-1-701, and Appendix C	All tuition and fees are not clearly stated in the catalog, and there is no evidence that the schedule of charges is being uniformly administered to similarly circumstanced students (page 6).	
6.	3-1-701 and Appendix C	The ESL program is not fully disclosed in the catalog as approved, to include all required program disclosures (page 7).	
7.	3-5-202	One general education course does not meet Council's standards. Consequently, the bachelor's degree program does not include the required 54 quarter credits minimum for general education (page 7).	

At-Risk Institutions Group (ARIG)

March 1, 2018 Meeting Agenda & Minutes

Committee Members

Ms. Michelle Edwards, President

Ms. Perliter Walters-Gilliam, Vice President - Accreditation

Mr. Steven Gelfound, Vice President - Operations (Absent)

Ms. Karly Zeigler, Manager - Institutional Compliance

Ms. Katie Morrison, Senior Coordinator - Accreditation Compliance

Old Business

- 1. California University of Management and Sciences (CALUMS) Outcome of BPPE Accusation In the light of the institution's admission of guilt, and the BPPE's stayed revocation order with a 5year probation, the Committee discussed possible recommendations for the Council's consideration of the institution's RA application which is currently under a compliance warning. While the institution had satisfactorily addressed all findings related to its renewal review which was completed last year, the pending court proceedings for this Accusation resulted in the Council placing the institution on compliance warning and extending its grant through April 2018. To provide additional context for the Council, staff will prepare the following materials to be included in the file review:
 - Review the institution's current ownership structure to determine if any officers or shareholders are identified as being banned from such ownership as outlined in item #18 in the settlement.
 - Review the institution's student enrollment data as reported on the First Quarter Report (due today) to determine the number of students currently impacted by any adverse action.
 - Follow up with Karen Johnson, Special Agent, at the BPPE to see if she is able to provide any additional information or context to the settlement.
 - Review financial records to determine if there is a pending concern with financial stability in light of the restriction on new enrollment, and disclosure required to prospective students.
- 2. Everest University South Orlando Threat Follow-Up Following the visit by the CT police, during which the complainant agreed to stop communication, another complaint was received. Staff will prepare a timeline of communication to and from the complainant with ACICS for legal review and action. The Group discussed the acknowledgement of the complaint even if there were no areas of Criteria violation.

New Business

American University of Bosnia & Herzegovina (AUBiH)
 Given the areas identified in the complaint, an unannounced visit would have been appropriate if the institution was located within the US or its territories. Being an international institution, located outside of the major city, travel to and through would be challenging. That being the case, the institution should be asked for a detailed response with notice that it will be reviewed by the Council for action.

2. Fortis Institute – Erie (two previous UA visits – 2016 and 2018)

This institution's grant will expire automatically on April 30, 2018, as they choose not to renew their accreditation with ACICS, being in application with ACCSC. However, this is at least the 3rd complaint that includes similar allegations about supplies, books, faculty, etc. As noted, a visit was most recently conducted in January 2018 after receipt of a complaint from a former faculty in the same MA program and the campus's cancelation of the RA visit. The Group advised that even though the campus will cease to be accredited at the end of April, a review of this complaint should be tied to the pending review of the Unannounced visit that was recently conducted (there was one finding).

3. Miami Regional University

Given the generalizations of the complaint, additional information will be requested in order to determine if an investigation can be conducted on those areas that pertain to the Accreditation Criteria.

AT-RISK INSTITUTIONS' GROUP (ARIG) EXTERNAL INFORMATION REVIEW APRIL 2018

Open External Information Review: 3 cases
Closed Reviews: 2 cases

Open External Information Review:

California University of Management and Sciences – BPPE Settlement, Anaheim, CA

In September 2017, the institution's president, Dr. David Park, informed ACICS that the Bureau of Private and Postsecondary Education ((BPPE) had formally filed an Accusation against the institution to which it was responding. Soon thereafter, after speaking with BPPE Agent, Karen Johnson about the Accusation, an onsite review was facilitated by Ms. Michelle Edwards, ACICS President, and Dr. Judee Timm, ACICS Commissioner. The team's report, which had no findings, was added as a supplement to the institution's outstanding compliance warning action for its renewal of accreditation review. Given that the court date was set for early 2018, the Council acted to continue the compliance warning action and request that the institution provide an update on the BPPE Accusation.

April 2018:

On February 14, 2018, the institution reached a Settlement with the BPPE, which in summary, was its admission of guilt on all allegations. While this admission resulted in the REVOCATION of the institution's license, the settlement resulted in a STAY of that decision with a 5-year probation and an extensive number of stipulations (copies provided).

In light of the current review of the institution's renewal of accreditation, guidance and a recommendation would be needed from the Business Practices Committee (BPC).

2. American National University (formerly known as National College) - Kentucky Attorney General's Office

Summary of Issues:

The Kentucky Attorney General's launched an investigation into Daymar Colleges in that state, citing misrepresentation, admission of students not meeting requirement, falsification of grades etc. They also launched an investigation into National College, citing misrepresentation of placement rates hased on a calculation that National was using on their website. (2012)

December 2016 Status:

According to the update provided by American National University, discovery

disputes have slowed the process with both parties filing motions to compel. There was an original trial date set for October 10 – 17, 2016 but that had to be rescheduled as a result of the August 25, 2016 hearing during which the Court extended the discovery process. A status conference has been set for January 18, 2017 at which time the Court will evaluate the progress made to determine the need for continued discovery or to set a trial date. Finally, the Judge who considered the case on August 25 has since announced his retirement and a new judge has not yet been appointed.

April 2017 Status:

According to the update provided by American National University, the case is still in the discovery phase. The institution reported that at the January 18, 2017 status conference, additional discovery issues were discussed and an additional status conference was scheduled for May 31, 2017. A new judge was appointed to fill the vacancy which will be created by the August 2017 retirement of the current judge hearing the case. The necessity for the new judge to update themselves on the litigation will possibly delay the proceedings. The institution anticipates the trial date to be set in early to mid-2018.

August 2017 Status:

According to the update provided by American National University, the case is still in the discovery phase of the litigation and an extended deadline for discovery is not September 1, 2017. The parties are negotiating scheduling of additional depositions but the institution anticipates that there will be no further extensions of the discovery deadline; the trial is currently set for January 8, 2018. A hearing was held on July 19, 2017 to consider several pre-trial motions. One motion was granted with the effect of limiting damages and three others are pending the court's decision.

December 2017 Status:

According to the update provided by American National University, the case is scheduled for trial from January 8, 2018 – January 19, 2018. The institution noted that the Court has determined that the AG is not entitled to a jury trial in the matter so that it would be only be heard by the judge. Several additional motions are pending, including partial summary judgment which, if granted, would further alter the shape of the litigation at trial.

April 2018:

A summary of the proceedings along with a copy of the Court's decision was submitted to ACICS. The institution made note of the following conclusions by the Court concerning the allegations made by the AG:

1. Disclosed and published graduate Employment rates instead of job placement rates (with an explanation) was misleading and a violation of the Kentucky Consumer Protection Act (KCPA) but not willful or arising to the standard of inexcusable carelessness.

 Use of outdated employment rates on its website was false and accordingly a violation of the KCPA but again, not willful or arising to the standard of inexcusable carelessness.

The Court determined that for the two findings above, the College HAD committed a willful violation and every day that the employment rates were on the website constituted a separate violation – totaling 1148 violations. Instead of the ruling in the AG's favor for the MAXIMUM penalty per violation (\$2000), the Court assessed a \$20/violation instead totally \$22960.

The institution had not yet made the decision to move the Court to reconsider its findings or appeal the Court's decision and will provide an update to ACICS as soon as it was available to share.

Conclusion: Continued monitoring of this matter. The corporation has a number of institutions accredited by ACICS, one of which (in Salem) recently withdrew its accreditation after successful transition to DEAC. Further, this institution (four campuses in KY) is currently under consideration by ABHES at its May 2018 meeting.

A number of SA show-cause directives have been taken or are recommended for a number of campuses. Financial review actions or discussions will also be noted as part of the monitoring process.

3. Harris College of Business/Premiere Education Group - NY Times, Linwood, NI

Summary of Issue:

News media reports from February 2014 described litigation filed against Harris College of Business by former employees contending that school officials "routinely misled students about their career prospects, and falsified records to enroll them and keep them enrolled." The complaint is an amended version of a qui tam / False Claims Act lawsuit brought by the same individuals in 2011 but undisclosed publicly. After formal investigations, both Federal and State prosecutors declined to prosecute the allegations under federal and state whistle blower statutes. The individuals then decided to pursue litigation through civil action, which prompted the public disclosure and coverage by the news media. (2014)

April 2016 Status:

Harris School of Business continues to contest the appeal of the former favorable court decision by the state of New Jersey. One of the key issues will be argued in front of the New Jersey Supreme Court in April. The institution noted that the state Department of Justice had declined to intervene in the matter after reviewing the allegations and numerous documents.

April 2017 Status:

The institution's response indicated that on February 11, 2017, the parties submitted supplemental briefs to the court, but no further action has been taken in the case by either party or the court.

April 2018 Status:

No follow up information has been received from the institution.

Conclusion: ARIG will continue to monitor the Harris College of Business/Premier Education Group case, taking into consideration other risk factors.

Closed Cases:

Career Education Corporation - NY & FL Offices of Attorneys General / USDOE

Summary of Issues:

While submitting documents for a subpoena issued by the New York Attorney General's office, Career Education Corporation (CEC) reported findings of improper placement practices at some of its campuses. They launched an internal investigation to try and discover how the practices affected their reported placement rates. Meanwhile, state investigations were also initiated in Florida and Illinois. All of the State Attorney General activity is based on verification that the schools have not violated various consumer protection laws in the state. The states have subpoenaed documents relating to marketing, advertising, recruitment, placement and student outcomes.

The state initiated investigations led to an inquiry from the Chicago/ Denver School Participation Team of the USDOE, requesting copies of all subpoenaed documents and all adverse information responses.

ACICS was notified that ACCSC opened adverse against their CEC schools and asked for a response to the issues. Subsequently, ten campuses of CEC were show-caused by ACCSC, citing the integrity of their placement practices and employment data.

See previous reports for the chronology of review

April 2017 Status:

The last campus (main in Tampa) accredited by ACICS will close on April 29, 2018. Consequently, the monitoring of this matter is closed.

2. Spencerian College - Attorney General of Kentucky, Louisville & Lexington

Summary of Issues:

The Attorney General of Kentucky has filed a lawsuit claiming that Spencerian College violated the Kentucky Consumer Protection Act, by providing unfair, false,

misleading and deceptive information to consumers about job placement rates, graduation success and Spencerian operations in general. Specifically, the complaint alleges discrepancies between placement rates reported to ACICS and those advertised by Spencerian. (2013)

<u>Conclusion:</u> The institution withdrew its ACICS accreditation on December 12, 2017. The matter is closed.

Appendix A

Summary of On-site Evaluations Initiated by ARIG in Winter 2018

School ID	Institution Name	Visit Location	Visit Start Date	Reason for Visit	Comment
00051218	iGlobal University	Vienna, VA	01.11.18	Investigation of complaint concerning the recruitment and admission of students from ACCT (closed in December)	Institution withdrew its accreditation 04.06.18
00019411	Stratford University	Falls Church, VA	01.11.18	Investigation of complaint concerning the recruitment and admission of students from ACCT (closed in December)	None – there were no findings and the institution is not set for a review until 2019
00010934	Fortis Institute	Irie, PA	01.18.18	Quality assurance review in lieu of a full renewal due the campus's planned 2018 closure.	The institution was choosing to let its extended grant expire on 04.30.18 but is on the agenda with a request for reconsideration

ARIG Meeting Agenda

May 10, 2018

Attendees:

Michelle Edwards, President Karly Zeigler, Manager of Policy and Institutional Compliance Kay Ropko, Perliter Walters-Gilliam, VP Accreditation

OLD BUSINESS

- 1. Florida Career College Media Report about loss of VA approval.

 The institution provided a response to the request for an explanation which was received and reviewed by the BPC at the April 2018 meeting. As a result of its, review, the Council directed unannounced visits to evaluate the record-keeping practices at various campuses. It was also noted that the institution will be undergoing the renewal of accreditation process in the Fall 2018 cycle.
- 2. Miami Regional University complaint

 Additional information was requested from the group of students who sent the
 complaint in via postal mail...no response was received and the matter is closed.

 However, the institution is scheduled to undergo the renewal accreditation process in
 Fall 2018 and the team will be appraised accordingly.
- 3. American University of Bosnia and Herzgovina Detailed response received to detail compliance
- 4. Fortis Institute Erie

While the campus addressed the one finding identified in the unannounced, a full team visit will be conducted in the spring to evaluate full compliance.

- 5. Everest University Complainant
 The matter is in the courts and beyond ACICS.
- Grassley Letter Response
 Consultation with external experts on the preparation of a letter to Senator Grassley.

NEW BUSINESS

- 1. Discussion of access to HCM Actions by SFA
- 2. Florida Career College –

- a. Recent Program Review
- b. Council Directed Unannounced Visits (3)
- c. Open Complaints and SA actions
- 3. Virginia College, LLC Institutional Show-Cause (FYI)
- **4.** Northwestern Polytechnic University Class Action Lawsuit Request information from the institution on the lawsuit and any development on the matter.
- **5.** Humacao Community College Complaint *on the fall 2018 evaluation cycle so allegations will be incorporated into the review.*

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-162



May 2, 2017 ID Code 00010456(BC)

VIA E-MAIL AND REGULAR MAIL

acics25@national-college.edu

Ms. Paula Ciolek Interim Campus Director American National University 125 South Killarney Lane Richmond, KY 40475

Subject: Renewal of Accreditation - Deferral Letter

Dear Ms. Ciolek:

At its April 2017 meeting, the Council considered your campus's application for a renewal of accreditation, the visit report, and the response. The visit yielded four findings, of which the institution has satisfied one to the satisfaction of the Council. As a result of its review, the Council requires additional information in the following areas of the *Accreditation Criteria*:

- The Campus Effectiveness Plan (CEP) does not include an explanation of how data will be
 used to improve the educational process (Section 3-1-111 and Appendix K). In response to
 the finding, the campus submitted a revised 2017 CEP that included a discussion of how the
 data collected from various activities of each element of the CEP will be used to improve the
 educational process, except there was no data and analysis provided for the graduation rates
 element of the CEP.
- 2. The campus does not conduct follow-up studies on graduate satisfaction at specific measuring points following placement of the graduate (Section 3-1-441(c)). In response to the finding, the campus submitted documentation of the policy and a sample of a survey conducted following confirmation of the placement. However, there was no evidence that surveys were administered at specific measuring points following placement of the graduate.
- 3. The written catalog does not match the online catalog, student services information is omitted from the printed and online versions of the catalog, and the campus does not update the catalog at appropriate intervals (Sections 3-1-700, 3-1-701, and Appendix C). In response to the finding, the campus identified student services addressed in the catalog on various pages. The campus also explained that the online, multiple-campus catalog is systematically updated each month. However, the hard copy catalog is not being updated appropriately; rather, updates or revisions are located in a large addendum. Also, full-time faculty are not identified for the campus in the online catalog.

Council Action

Therefore, the Council acted to continue the current grant of accreditation through December 31, 2017, and to defer further action until its August 2017 meeting pending receipt of the following information:

- 1. Documentation that the campus has collected appropriate data and analysis of graduation rates and included it within the CEP. The campus must describe the methodologies used to collect data, provide a rationale for using that data, as well as a summary and analysis of the data collected. The CEP must also include an explanation of how the data is being used to improve the educational processes at the campus and any changes made to the educational processes that are directly related to the collection and analysis of these data.
- Evidence of follow-up studies on employer and graduate satisfaction, conducted at specific
 measuring point following placement of the graduates. The campus must disclose what
 specific measuring points are utilized for assessment and submit a summary of findings once
 the surveys have been collected. The intuition must also submit the graduate and employer
 surveys.
- 3. Evidence that both the physical and online multiple-campus catalogs are accurate, consistent, and are updated at appropriate intervals. Documentation must include, but is not limited to, a draft physical catalog and a draft online catalog that contain consistent information, including a list of full-time faculty as well as administrators for each campus.

The information or reports listed above must be received in the Council office electronically by **June 30, 2017**. The institution's ongoing attention and efforts toward continuous improvement are a very important component of its accredited status, and your responsiveness to this Council action letter is essential to a favorable outcome for both the institution and its students.

Please contact Ms. Karly Zeigler at kzeigler@acics.org or (202) 336-6846 if you have any questions.

Sincerely,	
(b)(6)	
Roger J. Williams	
Interim President	

c: Ms. Keeley Gadd, Lexington main campus (acics21@national-college.edu)

Ms. Sarah Levy, Kentucky Council on Postsecondary Education (sarah.levy@ky.gov)



May 1, 2017 ID Code 00010602(MC)

VIA E-MAIL AND REGULAR MAIL

acics@empirecollege.com

Mr. Roy Hurd President and CEO Empire College 3035 Cleveland Avenue Santa Rosa, CA 95403

Subject: Renewal of Accreditation - Compliance Warning

Dear Mr. Hurd:

At its April 2017 meeting, the Council considered your institution's application for renewal of accreditation, the team's visit report, and the institution's response to the report. The visit yielded three findings, one of which was satisfactorily addressed. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

There is no evidence that credits are being properly awarded in two classes (Section 3-1-516(a)(i)). At the time of the team's visit, three students were being given credit for two different courses that were being taught in the same classroom at the same time. Although the classes were rescheduled prior to its departure, the team was concerned whether the coursework already completed for that term would satisfy the contact hour requirement in both courses.

In response to this finding, the institution asserted that this was an unintentional, one-time occurrence and that the hours have been completed appropriately by the three students. The institution also submitted updated schedules and a copy of its new procedure to avoid any future duplicate schedules. However, since the change in schedules occurred after the start of the term, there is no documentation to evidence that the students completed the appropriate contact hours for credit to be granted in both classes.

2. There is no evidence that Pharmacology courses are being taught by qualified faculty members (Section 3-3-302(d)). In response to the finding, the campus submitted a narrative explanation that the current term has ended and Ms. Judith Baker, the instructor noted as not being qualified to teach, will not be teaching pharmacology courses in the future. Additionally, transcripts of pharmacology coursework completed at the institution were provided for two medical assisting instructors, whom the institution noted would be

Mr. Roy Hurd September 28, 2017 Page 2 of 3

assigned to the courses in the future. However, there was no indication that one or both of the newly appointed pharmacology instructors have been assigned to teach the course in the current term; that the course has been added to their teaching schedule; or that they have demonstrated competency in the subject area, beyond the limited coursework completed at Empire College, with no evidence of any field certifications or work experience.

Council Action

Therefore, the Council acted to place your campus on **compliance warning**, continue the current grant of accreditation through December 31, 2017, and require the following information for subsequent review at its August 2017 meeting:

- Evidence that Ms. Alejandra Infante, Ms. Sandra Torres, and Ms. Noel Wood completed the necessary contact hours for both the MDN400B Medical Career Prep and MDN255 Medical Assistant Certification Exam courses in the January 30, 2017-March 9, 2017 term. Documentation must include a summary of the number of hours that were completed concurrently prior to the rescheduling of the courses; how the institution supplemented the content for these hours to satisfy both courses; a schedule of the make-up classes provided to the students; and sign-in sheets to evidence the students' completion of the hours. Additionally, the institution must submit a copy of the students' academic records.
- 2. Evidence that the pharmacology courses are taught by qualified instructors. Documentation must include a current teaching schedule with faculty assignments, a revised data sheet and notice to Ms. Baker to reflect her reassignment from teaching the course, and documentation to support the specific competencies of Ms. Lisa Schumann Mijares and Ms. Nancy Stuart in the subject area. The documentation for Ms. Mijares and Ms. Stuart must include clear and compelling evidence, such as certifications and/or specific work experience with employer attestations, and any other factors that bear on their qualifications.

The information or reports listed above must be received in the Council office electronically by **June 30, 2017**. The institution's ongoing attention and efforts toward continuous improvement are a very important component of its accredited status, and your responsiveness to this Council action letter is both appreciated and essential to a favorable outcome for both the institution and its students.

Mr. Roy Hurd September 28, 2017 Page 3 of 3

Please contact Ms. Karly Zeigler at kzeigler@acics.org or (202) 336-6846 if you have any questions.

Sincerely,	
(b)(6)	
Roger J. Williams	
Interim President	

- c. Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Ms. Martina Fernandez-Rosario, U.S. Department of Education, School Participation Team – Region IX (martina.fernandez-rosario@ed.gov)
 - Ms. Leeza Rifredi, Bureau For Private Postsecondary Education (Leeza.Rifredi@dca.ca.gov)



August 26, 2016

VIA E-MAIL AND UPS DELIVERY

Ms. Debra Hooper Vice President/Director Living Arts College @ School of Communication Arts 3000 Wakefield Crossing Drive Raleigh, NC 23814 acics.lac@living-arts-college.edu

Dear Ms. Hooper:

LIVING ARTS COLLEGE @ SCHOOL OF COMMUNICATION ARTS,

ID CODE 00023814(MC)

RALEIGH, NC

LIVING ARTS INSTITUTE @ SCHOOL OF COMMUNICATION ARTS, WINSTON-SALEM. NC

ID CODE 00033024(BC)

Subject: Renewal of Accreditation Show-Cause Directive Letter

The Council reviewed your institution at its recent meeting, including the institution's application for renewal of accreditation, the reports for the on-site evaluation visits conducted in May 2016, and the institution's response to the visit reports. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

- 1. The placement rate could not be verified in a number of programs at both the Winston-Salem and Raleigh campuses. The institution has not demonstrated a process of careful recordkeeping due to numerous inaccuracies and inconsistencies found during the on-site evaluation visits and numerous revisions made to the Campus Accountability Report (CAR) submitted in the institutional response as a result of these findings (Sections 3-1-303(a) and 3-1-203).
- 2. The campus does not maintain documentation indicating approval of the use of commendations in its advertising (Sections 3-1-703 and Appendix C).

Council Action

Due to the serious nature of the findings discovered during the institution's on-site evaluation visit and the inability of the institution to provide evidence to satisfactorily resolve these findings, the Council directed the institution to show-cause why its application for accreditation should not be denied or otherwise conditioned during the December 2016 review cycle. The

Ms. Deborah Hooper August 26, 2016 Page 2

institution is required to review and follow the Council hearing procedures as detailed in Section 2-3-500 of the *Accreditation Criteria* and the "Schedule of Fees" listing on the ACICS website. The institution must provide the appropriate notification and fee within ten days of receipt of this notice.

In response to the show-cause directive, the institution must submit the following information by **November 1, 2016**:

1. Evidence that supports the placement of graduates as indicated on the 2015 Campus Accountability Report (CAR).

Winston-Salem campus

Evidence of placement verification and waiver documentation for those students identified in the team's report and not addressed in the campus response, or incompletely addressed in the response as listed below:

Graduate/Program	Status on original CAR, not verified during the team visit	Status on CAR revised July 1, 2016 Placed by skill: no further documentation provided	
(b)(6) Medical Assistant (MA)	Placed by title (Home Care Attendant)		
(b)(6) MA	Placed by skill (not employed)	Placed by benefit: no further documentation provided	
(b)(6) MA	Placed by benefit (Medication Aid, benefit not confirmed by graduate)	Not available for placement due to continuing education: no further documentation provided	
(b)(6) Nwaokolo, MA	Placed by benefit (CNA)	Placed by benefit: attestation of benefit provided, but no supporting documentation to evidence benefit	
(b)(6) Hicks, MA	Placed by title (Administrative Coordinator at health services agency)	Placed by skill: attestation of benefit and resume provided, but no documentation to support skills utilized in position	
(b)(6) MA	Placed by title (CNA)	Placed by benefit: no further documentation provided	

Graduate/Program		Status on original CAR, not verified during the team visit	Status on CAR revised July 1, 2016	
(b)(6) MA		Placed by skill (Habilitation Technician)	Placed by benefit: resume and exit interview provided, but no attestation and supporting document to evidence benefit	
(b)(6) MA		Placed by skill (Habilitation Technician)	Placed by benefit: resume and exit interview provided, but no attestation of benefit and supporting document to evidence benefit	
(b)(6) Massage Therapy (MT)		Placed by title (Front Desk Associate)	Placed by skill: attestation of benefit provided, but no documentation to support skills used in position	
(b)(6)	MT	Not working (not reviewed during visit because of "not working" status")	Placed by title: e-mail dated 6/22/16 from employing company provided, but no date of employment given or other supporting documentation	

The Council has serious concerns with the lack of accurate and substantive recordkeeping evidenced in the submission of the 2015 CAR and the response materials relating to placement classifications. The campus changed a number of placement classifications, including graduates who were placed by title or by skill into placed by benefit, and one graduate who was classified originally as not working into placed by title. These concerns are heightened by the fact that the campus, in its original submission of the 2015 CAR, had a stated placement rate of 59.6 percent.

The Council finds a serious lack of credibility with the institution's misclassification of the placed by benefit category, which should not and cannot be used as a way to circumvent placing a graduate who does not meet the placed by title or by skill classification. For example, the campus has a student who was placed as a Certified Nursing Assistant (CNA) following completion of their Medical Assistant program. The campus cannot determine that this student is placed unless there is specific evidence that the student needed this particular credential to receive employment in that position and the campus must provide such evidence in order to verify the accuracy of the placement classification. Documentation should include, but is not limited to, a signed letter of employment or job description from the employer that indicates evidence that that the training and credential received were necessary to obtain the job indicated.

Ms. Deborah Hooper August 26, 2016 Page 4

The campus must submit another revised and corrected 2015 CAR, with the appropriate fee, which includes a detailed explanation on each of the revised classifications. The campus must include back-up documentation to substantiate the reclassification. If there is insufficient evidence to support the classification of these revised placements, then the campus must classify these students as not placed.

The campus must also provide a revised CEP that includes program improvement plans for any programs whose placement rates now fall below ACICS standards as a result of graduate reclassifications.

Raleigh campus

The campus revised its 2015 CAR to reclassify two graduates as not placed, since they were unable to gather evidence that supported their original classification of placed by skill. The campus must submit evidence that supports the placement by benefit of training for the Digital Audio Production and Design graduate, Mr. (b)(6)

Documentation should include, but is not limited to, a job description or signed letter of employment from the employer. The campus may provide documentation from the graduate, indicating how the training received in the program was beneficial in obtaining or maintaining the job, only if it is also accompanied by documentation from the employer of the graduate obtaining the job and evidence that that the training and credential received were necessary to obtain or maintain the job indicated.

Third-Party Placement Verification

In addition, the institution (both campuses) must provide evidence that every placement listed on the 2015 CAR, as well as those listed on the 2016 CAR, have been validated through third-party verification. The institution must present a selection of three potential third-party verifiers to the Council within 10 days of receipt of the letter. ACICS will then select one of the third-party verifiers to serve in this role.

The institution must provide evidence of the contract with the third-party verifier as well as the completion of work done by this verifier. In addition to the standard verification report, the following information must also be submitted:

- The employer point of contact verifying placement if such contact is different from the data submitted to the third-party verifier by your institution.
- The date of employment if different from the date submitted to the third-party verifier by your institution.

- The placement category (by title, by skills or by benefit) if different from the
 category reported to the third-party verifier by your institution. If by title is found
 inadequate and by skills was found valid, the list of skills used to verify the
 placement must be recorded.
- 2. Evidence of prior written consent for those remaining videos on YouTube that contain commendations from graduates, including the "Living Arts College Alumni" videos and "Living Arts Institute: The Stories of Promise" video, or evidence that the campus has removed or amended such video clips. Documentation must include, but is not limited to, an e-mail, screenshot, or other documented record of a "Notice of take down" indicating the removal of the indicated video media.

Please submit eight hard copies of your response and one electronic copy via flash drive by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

Institutional Teach-Out Plan

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution is directed to submit an updated contingency teach-out plan that includes:

- a. A listing, by campus, of students with the student name; program of study; expected graduation date; and status of unearned tuition, status of refunds due, and current account balance for each student.
- b. A listing of comparable programs offered at other nearby institutions in the event that teach-out agreements or transfer arrangements are needed for students to complete their programs elsewhere.
- c. A custodian for all permanent academic records in case of closure that includes contact information for this individual or entity and the process by which students can obtain their records.
- d. A description of the financial resources available to ensure that students can complete their programs or receive refunds if the institution does cease operations.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within established time frames without good cause. Please consult the Introduction of Title II, Chapter 3 for additional information.

Ms. Deborah Hooper August 26, 2016 Page 6

If you have any questions about this action, please contact Ms. Katie Morrison at kmorrison@acics.org or (202) 336-6783.

Sincerely,	
(b)(6)	

Roger J. Williams Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Mr. Christopher Miller, U.S. Department of Education, School Participation Team, Region IV (christopher.miller@ed.gov)
 - Mr. Terrence Scarborough, University of North Carolina Board of Governors (trscarborough@northcarolina.edu)
 - Ms. Theresa Sisneros, Commission on Accreditation of Allied Health Programs (theresa@caahep.org)



August 9, 2017

ID Code 00135778(MC)

VIA E-MAIL AND CERTIFIED MAIL

admin@nwsc.edu

Dr. Mohammed AliNiazee President Northwest Suburban College 5999 S. New Wilke Rd., Bldg #400 Rolling Meadows, IL 60008

Subject: Withdrawal of Accreditation by Suspension Action

Dear Dr. AliNiazee:

At its August 2017 meeting, the Council considered the institution's response to the report of a quality assurance visit conducted to the institution, the continued show-cause directive outlined in its letter dated April 11, 2017, and the institution's response to an extensive complaint filed by its former librarian.

On February 28, 2017, the institution was directed to show-cause why its accreditation should not be withdrawn when the Council received information from the Illinois Board of Higher Education that the institution had been offering bachelor's degree programs without approval from ACICS.

This directive was continued to the Council's April 2017 meeting, and the institution was directed to immediately cease any bachelor's degree activities. In its follow-up response to the Council, dated April 26, 2017, the institution provided documentation and assurance that all academic activities in the bachelor's degree programs in biology and chemistry had indeed ended. Subsequent to that submission, the institution also informed ACICS that it will not be pursuing a renewal of accreditation with ACICS, and instead, will let its grant expire on December 31, 2017. A limited-announced quality assurance visit was conducted on June 6-7, 2017, to determine if the institution had come into compliance with the show-cause directive as well as to ensure ongoing compliance with all Council standards through the expiration of its grant of accreditation. The visit resulted in 15 findings, one of which was the determination that academic activity had not ceased in the unapproved bachelor's degree programs.

While the institution was able to provide documentation that addressed four (4) of the team's findings, the Council found the following based on the *Accreditation Criteria*:

 The 2017-2018 Campus Effectiveness Plan does not include any reference as to how data have been collected, utilized, or analyzed at either the institutional or programmatic level Dr. Mohammed AliNiazee August 9, 2017 Page 2 of 6

for any of the required elements (Section 3-1-111). The institution submitted a current Plan as a revision to the 2013-2014 Plan provided to the team during the visit. The ongoing expectation of ACICS is that the CEP is evaluated at least annually and that it remains current; with a 2013-2014 Plan, it is evident that the institution has not maintained this expectation. Further, the current plan does include baseline data and goals for each outcome, how the data *will be* used to assess each outcome, and an explanation of how the data *will be* used to improve the educational processes; but it does not include any analysis of previous performance and its correlation to future educational goals. Further, the institution did not provide any documentation that the CEP has been fully implemented, that specific activities have been implemented, or that periodic progress reports were completed at least twice during the past academic year (Section 3-1-112). Further, while the plan does list the names and titles of the CEP planning committee, no meeting minutes were provided with signatures and dates, nor was there any explanation of the specific duties of each committee member.

- 2. Emphasis is not placed upon the efficiency and effectiveness of the overall administration of the institution (Sections 3-1-202 and 3-1-202(a)). In response to the finding, the institution submitted narrative attempting to explain why students were enrolled in a 300-level course during the visit in June 2017, when they had received a show-cause directive in April 2017 that specified all academic activities related to a bachelor's degree must cease. While some institutional narrative accepted blame for the error, other sections of the narrative blamed former ACICS employees for the error. The team report specifically mentioned concern with the integrity of Ms. Shazia Ilyas, associate dean of academic and student affairs, yet the institution did not provide any type of employee evaluation or job assessment for her. Further, the institution submitted an organizational chart with a number of vacant positions labeled as "To Be Announced" with no indication as to when the positions would be filled or by whom. Finally, the institution submitted a job posting on Indeed.com for an admissions representative dated July 7, 2017, with no evidence anyone had actually been interviewed, hired, and/or trained.
- There is no evidence that the institution has implemented appropriate grievance procedures for considering student complaints (Section 3-1-202(d)). During the visit, students interviewed stated they never received an institutional catalog and, therefore, knew nothing about institutional grievance policies. The institution submitted documentation of a flyer announcing how students can download the institutional catalog; a 2017-2018 school catalog with grievance policies on pages 44-48; a blank grievance form (to be completed by a school representative); a copy of a letter from Mr. vice president and chief operating officer, to all students and staff about the institutional grievance policy and student complaints; minutes from a Student Success & Retention committee, which addressed institutional grievance policies; a job posting for a new admissions representative; and a blank Code of Conduct form to be completed by all admissions department personnel. However, the Student Success & Retention committee meeting minutes did not include signatures of attendees; no

documentation was provided that any new admissions staff has been hired; and no documentation was provided that any existing or newly-hired admissions personnel has completed and signed the Code of Conduct for all admissions personnel.

- 4. Admissions policies are not being followed as written (Section 3-1-411). As previously mentioned, students interviewed during the team visit stated they never received an institutional catalog, and they also never attended a new student orientation. In its response, the institution submitted a copy of a blank enrollment agreement that has been revised to reflect students' acknowledgement of institutional policies and procedures. The institution also stated the former admissions director is being transitioned out of his current role, and also provided a schedule of upcoming orientation sessions for both degree and certificate students. While all submissions reflect what is to be done in the future, no documentation was provided to indicate any implementation of the changes.
- 5. The institution does not provide evidence that it systematically monitors and evaluates its recruitment activities (Section 3-1-412(a)). Again, the institution responded that the current admissions director is being transitioned out of the department, but no evidence of a new admissions director was provided. Further, the institution did not submit a plan for the systematic monitoring of recruitment activities other than a suggestion (in narrative) that the newly hired director of admissions will conduct such training.
- 6. There is no evidence that the individual designated to administer student financial aid is competent to serve in that role (Section 3-1-434(a)). In response to this finding, the institution submitted a campus bulletin, naming Dr. as the new on-site financial aid representative. However, the institution did not submit a signed job description for Dr. an updated ACICS Data Sheet, any type of written correspondence from a school administrator to all students and staff with the news of Dr. new responsibilities, or evidence of his completed training.
- 7. Employment assistance and career service advisement are not provided for all students (Section 3-1-441). The institution responded that they will be recruiting an advising and career services representative who will be responsible for employment assistance to both degree and certificate students. However, no evidence was submitted of a new hire with a signed job description, ACICS Data Sheet, or résumé.
- 8. Follow-up studies on graduate satisfaction are not conducted at specific measuring points following placement of the graduate (Section 3-1-441(c)). The institution submitted a copy of a blank alumni survey and a blank employer survey with a plan as to how they will utilize the surveys in the future. However, no completed surveys were included in the submission with any type of analysis or summary of survey results.
- 9. The institution does not provide sufficient evidence to document attendance at faculty meetings (Section 3-1-544). The institution provided minutes with signatures for one

Dr. Mohammed AliNiazee August 9, 2017 Page 4 of 6

meeting since the team visit. The title on the signature sheet of the meeting was "NWSC Staff Meeting Sign-In." The meeting was conducted on June 28, 2017, and lasted for 15 minutes. A careful review of meeting minutes revealed that no meeting items were dedicated to academics or curriculum.

- The institution does not provide student achievement information to the public (Section 3-1-704 and Appendix C). The institution responded that all public information about the college can be found within the National Center for Educational Statistics (NCES) website. However, the institution further explained that due to a "lag" in NCES posting of data, there was no data listed for the institution on this website in all actuality. The institution predicted this would be remedied at some point in 2017 or 2018. Further, while the institution has added a new link to their own website entitled Student Achievement Information, only programmatic retention and graduation rates for the allied health certificate programs are displayed. No information is listed for the associate's degree program in biology, and there are no placement statistics listed for any of the four institutional programs. Further, the information that is provided does not match the retention rates reported on the 2016 Campus Accountability Report (CAR).
- 11. The institution does not have a professionally trained individual to manage the library resources (Section 3-4-401). In the response to the finding, the institution submitted a copy of a signed agreement, dated June 19, 2017, between the institution's president, Dr. M. T. AliNiazee, and The Virtual Librarian Service. The consultant for the Virtual Librarian Service, as named in the agreement, is Dr. , whose signature is on the contract. The agreement states that Dr. and her professional librarians will develop appropriate and adequate library resources for the academic programs, provide library reference service, be responsible for written accreditation reports regarding the library, and provide asynchronous seven-day library reference service by e-mail, or web meetings, to all students, administrators, and staff. The institution's response explained that the Virtual Library Services will be attainable by students 24 hours a day, 7 days a week through a Moodle interface, to which every student has access. The institution did not provide a signed job description, an ACICS data sheet, résumé, or academic transcripts for Dr. the aforementioned professional librarians. Moreover, because the proposed library services are provided through an online-only format, the institution still does not have a professionally trained individual on site who is assigned to oversee and supervise the library and to assist students.

Additionally, the Council also considered a substantive complaint received from the institution's former librarian, the institution's response to the complaint, and additional information received from other institutional representatives. Allegations of misrepresentation of the bachelor's degree program offerings to students and ACICS, mishandling of refunds, and inappropriate disclosures, among others, were not sufficiently refuted by the institution but rather affirmed by other representatives who independently contacted ACICS.

Dr. Mohammed AliNiazee August 9, 2017 Page 5 of 6

Council Action

Therefore, the Council acted to withdraw the institution's accreditation by suspension. In addition to the institution's failure to demonstrate ongoing compliance with the *Accreditation Criteria*, the Council considered its blatant disregard for the Council's directive and subsequent questionable ethics in reporting its compliance as it relates to the bachelor's degree programs, and its inability to satisfactorily refute the substantive allegations identified by the former librarian

The institution has the right to appeal this decision to the Review Board of Appeals. The Council must be notified, in writing, within ten (10) business days of receipt of this notice if the institution desires to appeal this decision to the Review Board. The appeal notification must include payment in the amount of \$10,000. The Council's decision is final if the appeal notice and appropriate fee are not provided within the ten business days of your receipt of this notice. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then the institution will remain accredited through the length of the appeal, and more detailed appeal procedures and information will be forwarded to the institution.

If the institution elects not to appeal this action, the institution must submit any comments regarding this decision to the Council office within two weeks of the date of this letter. Should the institution choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

Institutional Teach-Out Plan

Further, to ensure that students will receive an appropriate outcome in the event of campus closure, the campus must provide the Council with an Institutional Teach-out Plan, utilizing the **online Request for Institutional Teach-out Plan application** in the Member Center. This Institutional Teach-out Plan must be completed as part of the institution's intent to appeal the withdrawal by suspension action.

The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner. The institution is advised that Section 2-3-900 of the ACICS Accreditation Criteria stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

Dr. Mohammed AliNiazee August 9, 2017 Page 6 of 6

Please contact Ms. Katie Morrison at kmorrison@acics.org or (202) 336-6783 if you have any questions.

Sincerely,	
(b)(6)	

Michelle Edwards President

- c: Ms. Shazia Ilyas, Associate Dean of Academic and Student Affairs, Northwest Suburban College (silyas@nwsc.edu)
 - Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Mr. Douglas Parrott, US Department of Education, Chicago/Denver School Participation Team Regions V & VII (douglas.parrott@ed.gov)
 - Dr. Daniel Cullen, Deputy Director for Academic Affairs, Illinois Board of Higher Education (cullen@ibhe.org)



September 26, 2017

ID Code 00050228(MC)

VIA E-MAIL AND REGULAR DELIVERY

acics@acct.edu

Dr. William Schipper President American College of Commerce and Technology 803 West Broad Street, #100 Falls Church, VA 22046

AMERICAN COLLEGE OF COMMERCE AND TECHNOLOGY, FALLS CHURCH, VIRGINIA AMERICAN COLLEGE OF COMMERCE AND TECHNOLOGY, ALHAMBRA, CALIFORNIA

ID CODE 00050228(MC)

ID CODE 00274252(BC)

Subject: Denial of Application for the Renewal of Accreditation

Dear Dr. Schipper:

At its August 2017 meeting, the Council considered your institution's application for renewal of its accreditation and the show-cause directive issued to the institution on January 3, 2017, which is incorporated herein in its entirety by reference. The Council reviewed the reports by the teams that conducted site visits to the institution's Virginia and California campuses in May and June 2017 and the institution's responses to these site visit reports. The Council also considered the May 2017 Consent Agreement that the institution reached with the State Council of Higher Education of Virginia (SCHEV) regarding the institution's certificate to operate in Virginia; and the July 27, 2017, correspondence to the institution from SCHEV advising you that SCHEV staff again is recommending that SCHEV revoke the institution's certificate to operate in Virginia following a SCHEV audit conducted at the institution in June 2017.

The Show-Cause Directive listed eight significant findings of noncompliance, which the Council directed the site visit teams to incorporate into their review. The site visit reports completed by the teams identified 18 findings of noncompliance at the Virginia campus and 41 findings of noncompliance at the California campus. In its response, the institution provided sufficient documentation to address many of the findings at the Virginia campus, although several findings remain, as outlined in more detail below. The institution chose not to provide a substantive response to the findings of noncompliance at the California campus.

Dr. William Schipper September 26, 2017 Page 2 of 4

The Council's review found that several critical components of operational and academic effectiveness remain from the Show-Cause Directive as documented by the evaluation teams and the institution's responses:

- 1. The institution has not been able to demonstrate the efficiency and effectiveness of the administration's oversight of basic operations (Section 3-1-202(a)). This finding is made on the basis of the following observations and determinations, which document a lack of administrative capability:
 - a. The institution first became accredited by ACICS in May 2015, following a prolonged and challenging application process. In early 2016, the Council was advised by SCHEV that the institution was significantly out of compliance with SCHEV standards, which are similar in material ways to Council accreditation standards, and that SCHEV was moving to revoke the institution's certificate to operate. Following receipt of the SCHEV action, the Council conducted a limited June 2016 site visit to the Virginia campus to review the campus's operations. The resulting site visit report identified 13 findings of noncompliance, many of them significant, just a year after the institution first became accredited. After reviewing the June 2016 team report and the institution's response, the Council directed the institution to show cause why its accreditation should not be withdrawn, and it directed full-team special visits to both campuses. These October 2016 site visit reports identified a total of 32 findings of noncompliance for the two campuses, less than 18 months after the institution first gained accreditation. The most recent team visits identified a total of 59 findings of noncompliance across both campuses. This history is persuasive evidence that the institution has failed continuously and materially to demonstrate a basic understanding of accreditation standards and the Council's expectations for accredited institutions.
 - b. Many of the findings of noncompliance are recurring, indicating an inability or unwillingness by the institution to follow through on commitments to the Council regarding efforts to prevent repeated findings. Repeat findings include, without limitation, concerns about the efficiency and effectiveness of the institution's administration; accuracy and completeness of institutional records; curriculum issues, including complete and correct course syllabi and identification of course prerequisites; publications and advertising; and the actual and documented qualifications of faculty to teach their assigned courses. The institution in some cases has provided documentation that these issues have been corrected, only for the Council to find the same issues on subsequent site visits.
 - c. Rather than respond to the site visit report regarding the 41 findings of noncompliance at the California campus, many of them significant, the institution instead advised the Council of its intention to cease new enrollments and to close the campus. This decision fails in any way to address the inadequacies of the educational

Dr. William Schipper September 26, 2017 Page 3 of 4

experience the institution is providing to its students enrolled at the California campus and the campus's continuing failure to comply with fundamental accreditation expectations.

- 2. The site visit team found that, at the time of the visit to the Virginia campus, only two students were enrolled in the Associate of Arts in Business Administration (AABA) program, and only four students were enrolled in the Bachelor of Science in Accounting (BSA) program. The team found, and the Council concurs, that these enrollments are insufficient to support regularly scheduled instruction in these programs. The institution's response states that it plans to discontinue all associate's degree programs in Virginia. The institution's response to the issue of inadequate enrollment in the bachelor's degree program states, in its entirety, "ACCT believes that by no longer offering the associate degree and enrolling its students in the bachelor's degree, it will better serve each of the bachelor degree programs by providing a continuous flow of students throughout the bachelor degree program." The institution provided no reasoning that would demonstrate how discontinuing the AABA program is going to have any material impact on the enrollment in the BSA program or any reason for the Council to conclude that the resulting enrollments will be sufficient to support regularly scheduled classes in the BSA program (Section 3-5-204).
- 3. The repeated findings of material noncompliance with the Council's accreditation standards, along with the institution's ongoing issues with SCHEV, call into question the integrity of the institution and the professional competence of its leadership (Section 3-1-202).

Council Action

Therefore, the Council acted to deny the institution's application for renewal of accreditation.

The institution has the right to appeal this decision to the Review Board of Appeals. The Council must be notified, in writing, within ten (10) business days of receipt of this notice if the institution desires to appeal this decision to the Review Board. The appeal notification must include payment in the amount of \$10,000. The Council's decision is final if the appeal notice and appropriate fee are not provided within the ten business days following your receipt of this notice. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then the institution will remain accredited through the length of the appeal, and more detailed appeal procedures and information will be forwarded to the institution.

If the institution elects not to appeal this action, the institution must submit any comments regarding this decision to the Council office within two weeks of the date of this letter. Should the institution choose to submit any comments, these comments will be included in the summary

Dr. William Schipper September 26, 2017 Page 4 of 4

detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

Institutional Teach-Out Plan

Finally, if the institution exercises its appeal rights, in compliance with Section 2-2-303 of the *Accreditation Criteria*, the institution is directed to provide the Council with an Institutional Teach-Out Plan, utilizing the **online Institutional Teach-Out Plan** application in the ACICS Member Center. This Institutional Teach-Out Plan must be completed as part of the institution's appeal and must pertain to both campuses.

The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner. The institution is advised that Section 2-3-900 of the ACICS Accreditation Criteria stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

Please contact Mrs. LaToya Boyd at lboyd@acics.org or (202) 336-6777 if you have any questions.

Sincerely,		
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(b)(6)		

Michelle Edwards President

- c: Dr. Cynthia Worthen, Alhambra branch campus (alhambra.acics@acct.edu)
 - Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
 - Ms. Nancy Gifford, U.S. Department of Education, School Participation Team, Region III (nancy.paula.gifford@ed.gov)
 - Ms. Martina Fernandez-Rosario, U.S. Department of Education, School Participation Team, Region IX (martina.fernandez-rosario@ed.gov)
 - Ms. Sylvia Rosa-Cassanova, State Council of Higher Education for Virginia (sylviarosacasanova@schev.edu)
 - Ms. Leeza Rifredi, California Bureau for Private Postsecondary Education (Leeza.Rifredi@dca.ca.gov)

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-163



April 24, 2018

ID Code 00011220 (MC)

VIA E-MAIL AND REGULAR MAIL

acics@msc.edu

Ms. Judith Sutton Director Mountain State College Spring At 16th Street Parkersburg, WV 26101-3993

Subject: Renewal of Accreditation and Campus-Level Student Achievement Show-Cause – Placement

Dear Ms. Sutton:

At its April 2018 meeting, the Council reviewed your institution's application for renewal of accreditation, the evaluation team's visit report, and the institution's response to the two findings identified in that report. The Council also reviewed your recently resubmitted 2017 Campus Accountability Report (CAR), which reported a campus-level placement rate of 58%.

Council Action

While the institution satisfactorily addressed the two findings related to its renewal of accreditation review, it is materially out of compliance with student achievement placement standards for two consecutive years, having reported 58% and 56% in 2017 and 2016, respectively.

Therefore, the Council acted to direct the institution to **show cause** why its current grant of accreditation should not be withdrawn by suspension or otherwise conditioned. In the interim, the institution is required to complete and submit the following information, via its <u>Renewal of Accreditation application (deferral response)</u> for the Council's monitoring and review:

- 1. Quarterly submission of the following reports and plans, with the first submission due no later than May 1, 2018, and the subsequent submission on August 1, 2018.
 - A corrective action plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve the programs that are negatively impacting the campus-level placement performance for the institution. The institution must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all activities implemented and completed for the purpose of placement remediation.
 - Quarterly 2018 Campus Accountability Reports (CAR). The institution is reminded that ONLY placements that have been submitted to the PVP, verified by the graduate and/or employer, and validated by ACICS may be reported on the Report.

- Institutional Teach-Out Plan with quarterly updates on the student progression of current enrollments.
- 2. Evidence that all current and prospective students have been advised of the show-cause status. The following statement must be placed prominently on the institution's website, no later than <u>five business days</u> following electronic transmission of this notice:
 - Notice to students and prospective students: INSTITUTION NAME, LOCATION has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), because of consecutive noncompliance with placement standards, having reported a ____% and ____% on the 2017 and 2016 Campus Accountability Report respectively.

Failure to provide all information requested by the Council constitutes a deviation from their directive and may result in the suspension or revocation of your institution's grant of accreditation.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within the established time frames without good cause. Given that the institution's longest program is offered at the academic associate's degree level, you are advised that compliance must be achieved within 24 months. Because the campus-level compliance warning for below-standard placement outcomes was issued in April 2017, the institution must come into compliance within the next 12 months. Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

Please contact Ms. LaToya Boyd at lboyd@acics.org or (202) 336-6777 if you have any questions.

Sincerely,	
(b)(6)	
Michelle Edwards	
President and CEO	

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education Dr. Corley Dennison, West Virginia Higher Education Policy Commission (Corley.dennison@wvhepc.edu)



May 3, 2018

ID Code 00021311(MC)

VIA E-MAIL AND CERTIFIED MAIL

acicsanaheim@calums.edu

Dr. Jong S. Yoon Interim President California University of Management and Sciences 721 North Euclid Street Anaheim, CA 92801

Subject: Renewal of Accreditation - Continued Compliance Warning

Dear Dr. Yoon:

At its April 2018 meeting, the Council considered your institution's application for renewal of accreditation, its December 2017 compliance warning action, and the Stipulated Settlement with the California Bureau of Private Postsecondary Education (BPPE) of February 13, 2018.

The institution's application for renewal of accreditation first appeared before the Council at its April 2017 meeting, with five findings identified in the team's report. Four of the findings were not addressed and the institution was placed on compliance warning. Following its August 2017 review by the Council, the institution was continued on compliance warning with three of the areas still outstanding. At its December 2017 meeting, the institution satisfactorily addressed the remaining areas of non-compliance from the renewal of accreditation review. However, it was at that time that the Council also considered the Accusation filed against the institution by the Bureau of Private Postsecondary Education, and the Council continued the compliance warning action, pending final determination of the Accusation.

Council Action

Due to the nature of the charges outlined in the Accusation and the institution's subsequent settlement with the BPPE, dated February 13, 2018, the Council acted to extend the current grant of accreditation through September 10, 2018, continue the institution on **compliance warning**, and require the following information for review at its August 2018 meeting:

1. A detailed narrative on the institution's eligibility for accreditation with ACICS as referenced in Section 2-1-302 of the *Accreditation Criteria*, having admitted guilt on all allegations on record with the state oversight agency.

- A current ownership disclosure and description of the composition of the Board of Trustees for the past three years to include details of when members were added or removed.
- A detailed explanation of the administrative and operational failures that resulted in the Accusation and settlement agreement with the BPPE, along with the changes made and implemented to demonstrate administrative capacity and integrity.
- 4. A summary of the institution's operation to include an audit of all programs with enrollment by program, student roster; a faculty and staff summary, which includes their date of employment, qualifications, and roles; and an account of the institution's current financial status.
- 5. Copies of all communication with the Department of Education concerning the Heightened Cash Monitoring 2 (HCM2) status. In addition, a narrative indicating how the institution's financial position is being managed under that status and the anticipated date they may be removed from HCM2 must also be provided.
- 6. In response to the stipulated agreement from BPPE, provide a narrative describing the reasons five administrators/board members were to be removed from service; including any documentation received from BPPE in that regard.
- Copies of all correspondence regarding the institution's compliance with the stipulations
 in the Agreement, including all reports that have been submitted to the BPPE as well as
 any communication from the Bureau.

The information or reports listed above must be received in the Council office electronically, via the institution's Renewal of Accreditation Application, by **June 29, 2018**.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within the established time frames without good cause. Given that the institution's scope of accreditation is through the master's degree level, you are advised that compliance must be achieved within 24 months from the time the institution was first found to be out of compliance (in April 2017). Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

The institution's ongoing attention and efforts toward continuous improvement are a very important component of its accredited status, and your responsiveness to this Council action letter is essential to a favorable outcome for both the campus and its students.

Dr. Jong S. Yoon May 3, 2018 Page 3 of 3

Please contact me at medwards@acics.org or (202) 336-6780 if you have any questions.

Sincerel	у,	
(b)(6)		

Michelle Edwards President and CEO

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education Dr. Michael Marion, Jr., California Bureau for Private Postsecondary Education (michael.marion@dca.ca.gov)

Case Name: In the Matter of Accrediting Council for

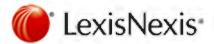
Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

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Bristol Univ. v. Accrediting Council for Indep. Colleges & Schs, 2017 U.S. App. LEXIS 10295

Client/Matter: G4699-00001

Bristol Univ. v. Accrediting Council for Indep. Colleges & Schs

United States Court of Appeals for the Fourth Circuit March 24, 2017, Argued; June 9, 2017, Decided No. 16-1637

Reporter

2017 U.S. App. LEXIS 10295 *; 2017 WL 2495201

BRISTOL UNIVERSITY, Plaintiff — Appellee, v. ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS, Defendant — Appellant.

Notice: PLEASE REFER TO *FEDERAL RULES OF APPELLATE PROCEDURE RULE 32.1* GOVERNING THE CITATION TO UNPUBLISHED OPINIONS.

Prior History: [*1] Appeal from the United States District Court for the Eastern District of Virginia, at Alexandria. (1:16-cv-00307-AJT-MSN). Anthony J. Trenga, District Judge.

Bristol Univ. v. Accrediting Council for Indep. Colls. & Schs., 184 F. Supp. 3d 262, 2016 U.S. Dist. LEXIS 55153 (E.D. Va., Apr. 25, 2016)

Disposition: REVERSED, VACATED, AND REMANDED.

Core Terms

accreditation, district court, renewal, agencies, preliminary injunction, deficiencies, funding, internal quotation marks, institution of higher education, federal common law, declaratory, violations, Training, merits, higher education, cause of action, due process, institutions, requirements, procedures, vacate, moot, diversity jurisdiction, federally, common law duty, federal law, student aid, quasi-public, show-cause, terminate

Case Summary

Overview

HOLDINGS: [1]-The court erred by granting the preliminary injunction because the court erred by finding that the school demonstrated a likelihood of success on the merits since the accrediting agency did not violate

due process by denying the school's renewal of accreditation application based on 24 unresolved deficiencies.

Outcome

Judgment reversed and vacated, and case remanded.

LexisNexis® Headnotes

Civil Procedure > Preliminary
Considerations > Jurisdiction > Diversity Jurisdiction

HN1 | Jurisdiction, Diversity Jurisdiction

The diversity jurisdiction statute provides that district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States. 28 U.S.C.S. § 1332(a)(1). A plaintiff's complaint sufficiently establishes diversity jurisdiction if it alleges that the parties are of diverse citizenship and that the matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C.S. § 1332.

Civil Procedure > Preliminary
Considerations > Jurisdiction > Diversity Jurisdiction

HN2 Jurisdiction, Diversity Jurisdiction

Diversity jurisdiction extends beyond state and foreign law claims to include federal law claims.

Civil Procedure > Appeals > Standards of

Review > Abuse of Discretion

Civil

Procedure > Remedies > Injunctions > Preliminary & Temporary Injunctions

HN3 Standards of Review, Abuse of Discretion

To obtain a preliminary injunction, a plaintiff must demonstrate that (1) they are likely to succeed on the merits; (2) they will likely suffer irreparable harm absent an injunction; (3) the balance of hardships weighs in their favor; and (4) the injunction is in the public interest. The appellate court reviews a district court's decision to grant preliminary injunctions under an abuse of discretion standard. The district court's decision will not be disturbed on appeal unless the record shows an abuse of that discretion, regardless of whether the appellate court would, in the first instance, have decided the matter differently. A district court abuses its discretion if it applies an incorrect preliminary injunction standard, rests its decision on a clearly erroneous finding of a material fact, or misapprehends the law with respect to underlying issues in litigation.

Administrative Law > Agency Adjudication > Decisions

HN4 Agency Adjudication, Decisions

Accreditation agencies owe a common law duty of due process to employ fair procedures when making decisions. A federally-recognized accrediting agency's actions are subject to the due process requirements of 20 U.S.C.S. § 1099b(a)(6) and its supporting regulation, 34 C.F.R. § 602.25.

Administrative Law > Judicial Review > Standards of Review > Arbitrary & Capricious Standard of Review

Education Law > Administration & Operation > Accreditation

<u>HN5</u> Standards of Review, Arbitrary & Capricious Standard of Review

Although the Administrative Procedure Act does not specifically apply to private accrediting agencies for education institutions, principles of administrative law are useful in determining the standard by which the appellate court reviews the agency's decision-making process. In assessing whether an accreditation agency violates due process, the appellate court considers only whether the decision of an accrediting agency is arbitrary and unreasonable or an abuse of discretion and whether the decision is based on substantial evidence. Under this standard, courts are not free to conduct a de novo review or to substitute their judgment for the professional judgment of the educators involved in the accreditation process.

Education Law > Administration & Operation > Accreditation

HN6 ★ Administration & Operation, Accreditation

Courts adjudicating common law due process claims against accrediting agencies should focus primarily on whether the accrediting body's internal rules provided a fair and impartial procedure and whether it followed its rules in reaching its decision. Agency actions are generally invalid where the agency fails to follow its own procedures or regulations.

Counsel: ARGUED: Thomas Collier Mugavero, WHITEFORD, TAYLOR & PRESTON, LLP, Falls Church, Virginia, for Appellant.

Robert William Loftin, MCGUIREWOODS, LLP, Richmond, Virginia, for Appellee.

ON BRIEF: Kenneth J. Ingram, Michael C. Gartner, WHITEFORD, TAYLOR & PRESTON, LLP, Falls Church, Virginia, for Appellant.

Richard D. Holzheimer, Jr., Brooks H. Spears, McLean, Virginia, Nathan A. Kottkamp, MCGUIREWOODS, LLP, Richmond, Virginia, for Appellee.

Judges: Before TRAXLER and WYNN, Circuit Judges, and DAVIS, Senior Circuit Judge, WYNN, Circuit Judge, concurring.

Opinion by: DAVIS

Opinion

DAVIS, Senior Circuit Judge:

Bristol University ("Bristol") is a California for-profit school that received accreditation from the Accrediting Council for Independent Colleges and Schools ("ACICS"). ACICS denied Bristol's application for renewal of accreditation, and Bristol challenged ACICS's decision in district court. The district court preliminarily enjoined ACICS from suspending Bristol's accreditation and stayed further proceedings. On appeal, ACICS contends [*2] that the district court erred by granting Bristol's request for a preliminary injunction because Bristol did not demonstrate a likelihood of success on the merits of its due process claim. For the reasons that follow, we reverse the grant of the preliminary injunction, lift the stay, and remand for further proceedings.

1.

Bristol offers one-year, two-year, and four-year programs in business administration and certificate programs in legal studies and hospitality operations. The school was founded in 1991 as Kensington College and received initial accreditation from ACICS in 1993. The college maintained consistent accreditation until 2011, when it underwent an ownership change and was renamed Bristol University. One year later, ACICS granted Bristol a three-year accreditation renewal that was to expire on December 31, 2015.

Bristol applied for renewal of its accreditation in October 2014. In May 2015, ACICS began the renewal process by sending an on-site evaluation team to Bristol. The following month, ACICS's evaluation team issued a report identifying 40 deficiencies requiring explanation from Bristol. Bristol responded to ACICS's report in July 2015.

On August 20, 2015, ACICS sent Bristol [*3] a deferral letter and show-cause directive that identified 37 areas in which the school remained noncompliant. ACICS requested that Bristol provide explanations and supporting evidence for each of the deficiencies by October 31, 2015. In the same letter, ACICS also directed Bristol to show cause why its renewal application should not be denied at ACICS's December 2015 meeting. The letter explained that "[ACICS] is obligated to take adverse action against any institution that fails to come into compliance with the Accreditation Criteria within established time frames without good cause." J.A. 233. ACICS referred Bristol to Title II, Chapter 3, of the Accreditation Criteria for more information, which provides that the "time frame will not exceed . . . two years, if the longest program is at least two years in length." J.A. 287, 593.

In September 2015, ACICS sent another evaluation team to Bristol. The team issued a report on October 29, 2015. On December 22, 2015, ACICS denied Bristol's renewal of accreditation application based on 24 unresolved deficiencies. In its denial letter, ACICS listed each of Bristol's remaining violations of the *Accreditation Criteria* and extended the current [*4] grant of accreditation to January 31, 2016, to allow the school to prepare for its loss of accreditation.

After the denial of the renewal application, Bristol appealed to the Review Board of Appeals (the "Review Board"), which is "a separate, independent appeals body established by [ACICS] for the purpose of hearing appeals by institutions." J.A. 292, 597. In the Review Board hearing on March 18, 2016, Bristol did not contest the 24 deficiencies. Instead, the school asked the Review Board to remand with the recommendation that Bristol receive additional time to correct the deficiencies. Later that day, the Review Board affirmed ACICS's decision.

On March 21, 2016, Bristol filed a complaint against ACICS in federal district court seeking declaratory and injunctive relief. Bristol also moved for a temporary restraining order prohibiting ACICS from revoking its accreditation, which the district court granted. On March 25, 2016, Bristol moved for a preliminary injunction, which the district court granted on April 25, 2016. The court concluded that Bristol was likely to succeed on the merits of its due process claim because ACICS "ignored its rationale for deciding to defer action, eliminated [*5] the compliance warning step, and advanced directly to the show-cause stage without giving Bristol clear deadlines for compliance, as opposed to providing additional information." J.A. 553. The court further found that ACICS's "failure to comply with its own internal review procedures [was] compounded by the lack of a record sufficient to determine what specific issues [ACICS] or the Review Board considered and decided, and on what basis it decided those issues." J.A. 554. The court noted that ACICS "did not explain . . . [why] no further opportunity to come into compliance was warranted," and that "[t]he Review Board did not provide any rationale in support of its position, either in the form of a written opinion, or an oral ruling during the hearing." ld.

ACICS timely appealed the district court's order granting a preliminary injunction.

II.

We first address whether we have jurisdiction over this appeal. In its complaint, Bristol invoked subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337 and 20 U.S.C. § 1099b. Since the appeal was filed, ACICS lost Department of Education recognition as an accreditation agency. ACICS has filed a lawsuit against the Department of Education and the Secretary of Education, asking the [*6] district court to grant preliminary and permanent injunctive relief enjoining the implementation of the decision to terminate ACICS's recognition as an accreditation agency, vacate the decision withdrawing ACICS's recognition, and order the Secretary of Education to return ACICS's petition for recognition to the Department of Education for reconsideration. See Accrediting Council for Indep. Colls. & Schs. v. U.S. Dep't of Educ., No. 16-cv-2448 (D.D.C.). In light of ACICS's loss of federal recognition, we asked the parties for supplemental briefing addressing whether the Department of Education's termination of its recognition of ACICS as an accrediting agency deprives us of jurisdiction over this appeal. We conclude that the district court had diversity jurisdiction over this dispute pursuant to 28 U.S.C. § 1332.

HN1 The diversity jurisdiction statute provides that "district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between . . . citizens of different States." 28 U.S.C. § 1332(a)(1). "[A] plaintiff's complaint sufficiently establishes diversity jurisdiction if it alleges that the parties are of diverse [*7] citizenship and that the matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. § 1332." Ellenburg v. Spartan Motors Chassis, Inc., 519 F.3d 192, 200 (4th Cir. 2008) (internal quotation marks and alterations omitted). Bristol's complaint did not invoke diversity of citizenship jurisdiction but did state that Bristol is a citizen of California and ACICS is incorporated in Virginia. Furthermore, although Bristol did not plead an amount in controversy, it did allege that without accreditation, the school would be forced to close. The value of Bristol as a business clearly exceeds \$75,000; thus, this dispute undoubtedly satisfies the amount in controversy requirement for diversity jurisdiction. See Hunt v. Wash. State Apple Advert. Comm'n, 432 U.S. 333, 347, 97 S. Ct. 2434, 53 L. Ed. 2d 383 (1977) ("In actions seeking declaratory or injunctive relief, it is well established that the amount in controversy is measured by the value of the object of the litigation."); Francis v. Allstate Ins. Co., 709 F.3d 362, 367 (4th Cir. 2013) (same).

Bristol's complaint contained three counts: (1) failure to comply with due process, in violation of federal common law; (2) negligence per se, in violation of the Higher Education Act, 20 U.S.C. § 1099b, and 34 C.F.R. §§ 602.16, 602.25; and (3) injunctive and declaratory relief pursuant to 28 U.S.C. § 2201 et seq. 1 HN2 1 Diversity jurisdiction extends beyond state and foreign law claims to include federal law claims like the ones Bristol [*8] has asserted. See Hales v. Winn-Dixie Stores, Inc., 500 F.2d 836, 848 n.1 (4th Cir. 1974) ("While state law claims usually may only be asserted when diversity is present, the same cannot be said of the converse: this Court knows of no case or policy requiring that diversity jurisdiction may only include state or foreign law claims and must exclude federal law claims. Federal law does on occasion control suits brought under diversity jurisdiction."). Accordingly, satisfied with the existence of federal subject matter jurisdiction, we proceed to consider whether the district court erred in granting the preliminary injunction.

III.

ACICS argues that the district court erred by granting Bristol's request for a preliminary injunction because Bristol did not demonstrate a likelihood of success on the merits of its due process claim, as Bristol failed to establish that ACICS's decisions were arbitrary and capricious. HN3[1] To obtain a preliminary injunction, a plaintiff "must demonstrate that (1) they are likely to succeed on the merits; (2) they will likely suffer irreparable harm absent an injunction; (3) the balance of hardships weighs in their favor; and (4) the injunction is in the public interest." League of Women Voters of N.C. v. North Carolina, 769 F.3d 224, 236 (4th Cir. 2014). We review "a district court's decision to grant preliminary [*9] injunctions under an abuse of discretion standard." Pashby v. Delia, 709 F.3d 307, 319 (4th Cir. 2013). The district court's decision "will not be disturbed on appeal unless the record shows an abuse of that discretion, regardless of whether the appellate court

¹ Of course, the *Declaratory Judgment Act* "creates [no] substantive rights," *CGM, LLC v. Bellsouth Telecomms., Inc., 664 F.3d 46, 55 (4th Cir. 2011)*, but under the circumstances of this appeal, and unlike our concurring friend, we need not pause to assess the legal sufficiency of the claims asserted in the first two counts of the complaint. Instead, given the undeniable existence of subject matter jurisdiction, we limit our consideration to the issue of whether the district court erred in applying the standards for a preliminary injunction, the very basis for this interlocutory appeal, over which we surely have jurisdiction. *28 U.S.C. § 1292(a)(1)*.

would, in the first instance, have decided the matter differently." Centro Tepeyac v. Montgomery Cty., 722 F.3d 184, 188 (4th Cir. 2013) (en banc). A district court abused its discretion if it "applied an incorrect preliminary injunction standard, rested its decision on a clearly erroneous finding of a material fact, or misapprehended the law with respect to underlying issues in litigation." Id. (internal quotation marks and alterations omitted).

HN4 Accreditation agencies owe a common law duty of due process "to employ fair procedures when making decisions." Prof! Massage Training Ctr., Inc. v. Accreditation All. of Career Sch. & Colls., 781 F.3d 161, 169 (4th Cir. 2015). ACICS was a federally-recognized accrediting agency when it reviewed and denied Bristol's renewal of accreditation application. As such, its actions were subject to the due process requirements of 20 U.S.C. § 1099b(a)(6) and its supporting regulation, 34 C.F.R. § 602.25.

HN5 Although the Acministrative Procedure Act does not specifically apply to private accrediting agencies for education institutions, "principles of administrative law are useful in determining the standard by which we review the agency's decisionmaking process." Prof'l Massage Training Ctr., 781 F.3d at 170 (alternations [*10] omitted). In assessing whether an accreditation agency violates due process, we consider "only whether the decision of an accrediting agency . . . is arbitrary and unreasonable or an abuse of discretion and whether the decision is based on substantial evidence." Id. at 171 (internal quotation marks omitted). "Under this standard, courts are not free to conduct a de novo review or to substitute their judgment for the professional judgment of the educators involved in the accreditation process." Id. (internal quotation marks omitted).

HN6 Courts adjudicating common law due process claims against accrediting agencies "should focus primarily on whether the accrediting body's internal rules provided a fair and impartial procedure and whether it followed its rules in reaching its decision." Prof'l Massage Training Ctr., 781 F.3d at 172 (internal quotation marks and alterations omitted). Agency actions are generally invalid where the "agency fails to follow its own procedures or regulations." Nader v. Blair, 549 F.3d 953, 962 (4th Cir. 2008).

A.

ACICS contends that the district court erred by determining that ACICS and the Review Board deprived

Bristol of due process by failing to explain the decision to deny Bristol's renewal application instead of providing Bristol more time to correct deficiencies. [*11] We conclude that ACICS and the Review Board were not required to explain that choice to comply with due process.

1.

The Accreditation Criteria clearly authorized ACICS to deny Bristol's renewal of accreditation application based on its numerous and repeated violations of the Accreditation Criteria. After determining that Bristol was not in compliance with the Accreditation Criteria, ACICS either could have "take[n] prompt adverse action against the institution, or . . . require[d] the institution to take appropriate action to bring itself into compliance with the Accreditation Criteria within a time frame specified by [ACICS] after the institution has been notified that it is not in compliance." J.A. 287, 593.

Over the course of seven months, ACICS conducted two site visits, repeatedly informed Bristol of its deficiencies, gave Bristol multiple opportunities to respond to those deficiencies, asked Bristol to explain why its renewal application should not be denied based on its remaining areas of noncompliance, and provided Bristol a written explanation for denying its application for renewal of accreditation based on the 24 unresolved violations it identified, none of which Bristol has contested. Nothing [*12] more was required to satisfy due process. See Prof'l Massage Training Ctr., 781 F.3d at 174 (holding that accrediting agency's denial of school's application for reaccreditation was not arbitrary and capricious because the school "was afforded ample notice that it was not in compliance with [the accreditation standards] and numerous opportunities to remedy identified deficiencies").

Furthermore, because the Accreditation Criteria permitted ACICS to deny Bristol's renewal of accreditation application due to Bristol's noncompliance with the accreditation standards, ACICS was not required to explain why it did not take an alternative action such as providing Bristol additional time to cure deficiencies. See Inova Alexandria Hosp. v. Shalala, 244 F.3d 342, 351 (4th Cir. 2001) ("As a general rule, the consideration of whether a lesser sanction might be adequate should be a step in the path to the ultimate decision But this does not mean that the Board's explanation had to include express consideration of possible alternatives to its decision."); see also Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 51, 103 S. Ct. 2856, 77 L.

Ed. 2d 443 (1983) ("[A]n agency [need not] consider all policy alternatives in reaching [a] decision."). ACICS's denial letter identifying Bristol's remaining violations of the Accreditation Criteria adequately explained its decision not to renew Bristol's accreditation, [*13] and no further explanation was necessary to satisfy the requirements of due process.

2.

The Review Board was similarly under no obligation to provide its rationale for not granting Bristol more time. The Review Board is a "separate, independent appeals body" with the power to affirm, amend, or reverse the decision of ACICS, or remand the case to ACICS with recommendations for further consideration. J.A. 292. 597-98. According to the Accreditation Criteria, "[t]he Review Board panel may amend or reverse the decision of [ACICS] or remand the case to [ACICS] for further consideration only if it finds the decision was: (i) arbitrary, capricious, or otherwise in substantial disregard of the Accreditation Criteria, or (ii) not supported by substantial evidence in the record on which [ACICS] took the negative action." J.A. 292, 598. Furthermore, "[t]he Review Board panel cannot amend or reverse the decision of [ACICS] or remand the decision based on argument by the appellant that [ACICS's] action was disproportionate to the violations cited." J.A. 292, 598.

The Review Board complied with the Accreditation Criteria by issuing a written decision affirming ACICS on the basis that "the action of [ACICS] is [*14] supported by substantial evidence in the record and was not arbitrary and capricious." J.A. 501. By determining that ACICS's decision was supported by substantial evidence and was not arbitrary and capricious, the Review Board properly conducted its limited review of ACICS's actions. Moreover, under the Accreditation Criteria, the Review Board did not have the authority to amend or reverse ACICS's decision based on Bristol's contention that more time was warranted to come into compliance, as that would violate the Accreditation Criteria's prohibition of amending or reversing a decision based on the argument that "[ACICS's] action was disproportionate to the violations cited." See J.A. 292, 598.

B.

ACICS next argues that the district court erred by finding that ACICS failed to follow its own internal review procedures when it advanced to the show-cause stage without providing Bristol a compliance warning or clear deadlines for compliance. We conclude that none of these actions violated the *Accreditation Criteria*.

ACICS did not violate its procedures when, in its August 2015 letter, it deferred action, issued a show-cause directive, and continued Bristol's accreditation through December [*15] 2015 to allow the school to provide its response. Nothing in the Accreditation Criteria indicates that ACICS could not simultaneously issue a deferral and a show-cause directive. ACICS explained in its letter that it was not only deferring action but also directing Bristol to show cause why its application should not be denied "due to the large and varied amount of findings incurred at the institution during the on-site evaluation and the inability to clear these findings in the institution's response." J.A. 223. ACICS followed the Accreditation Criteria's rules governing deferral, which provide that "[i]n all cases of deferral on renewal of accreditation of accredited institutions, [ACICS] will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed." J.A. 288, 594. By continuing the current grant of accreditation, ACICS provided Bristol time to respond and show cause why its accreditation should not be denied.

ACICS was not required to issue a compliance warning, and the district court erred by relying on the compliance warning requirement found in the 2016 Accreditation Criteria. The compliance warning requirement was added [*16] to the Accreditation Criteria on January 1, 2016, after ACICS had issued its denial letter. Although ACICS submitted the 2016 version of the Accreditation Criteria to the district court, the 2016 version stated that it was not in effect until January 1, 2016, and that the compliance warning was added as of that date.

Bristol was not entitled to more time and extended deadlines to achieve compliance. To the contrary, the Accreditation Criteria would have allowed ACICS to immediately withdraw Bristol's accreditation upon determining that Bristol was not in conformance with the accreditation standards. Although the Accreditation Criteria provide that two years is the maximum amount of time ACICS would give an institution like Bristol to come into compliance, ACICS was not required to provide Bristol any minimum amount of time to remedy its deficiencies. Even so, after finding Bristol noncompliant, ACICS did not promptly withdraw Bristol's accreditation but instead provided Bristol with clear deadlines within which to fix deficiencies: ACICS's June 2015 renewal of accreditation visit report requested an explanatory response to the school's 40 violations of the

Accreditation Criteria by [*17] June 25, 2015, and its August 2015 show-cause directive put Bristol on notice that it could lose its accreditation at ACICS's December 2015 meeting and asked Bristol to provide a response to its 37 remaining areas of noncompliance by October 31, 2015. Accordingly, ACICS did not violate due process by denying Bristol's renewal of accreditation application in December 2015 based on 24 unresolved deficiencies, and the district court erred by finding that Bristol demonstrated a likelihood of success on the merits.²

IV.

For the forgoing reasons, the district court's order granting the preliminary injunction and staying the proceedings is reversed, the stay is vacated, and this case is remanded for such further proceedings not inconsistent with this opinion as may be necessary in the discretion of the district court.

REVERSED, VACATED, AND REMANDED

Concur by: WYNN

Concur

WYNN, Circuit Judge, concurring:

I agree with the majority opinion that the proper result in this case is to vacate the district court's order granting a preliminary injunction in favor of Bristol University ("Bristol") and against the Accrediting Council for Independent Colleges and Schools (the "Accrediting Council"). But my reason for vacating [*18] the district court's order is based on mootness. The district court granted the preliminary injunction on grounds that Bristol was likely to succeed on the merits of its claim that the Accrediting Council breached its federal common law due process-like duty to Bristol in deciding to withdraw Bristol's accreditation. But following the district court's grant of the preliminary injunction, the Accrediting Council lost its federal recognition as an accrediting agency. The Accrediting Council's loss of recognition deprives federal courts of any basis to afford Bristol relief based on the two causes of action asserted

² Although ACICS argues that the district court committed several additional legal errors in applying the preliminary injunction standard, given our conclusion as to Bristol's likelihood of success on the merits, we need not reach the other asserted errors.

in the complaint, both of which rest on federal law governing federally recognized accrediting agencies. Thus, this case is moot, requiring us to vacate the injunction and stay entered by the district court and to remand with instructions that the case be dismissed without prejudice.

I.

The Accrediting Council, a not-for-profit accrediting organization, first accredited Bristol in 1993. In 2012, the Accrediting Council renewed Bristol's accreditation for a three-year period, running through December 31, 2015. At the time of the renewal, the Department of Education recognized [*19] the Accrediting Council as a national accrediting agency, thereby allowing attendees of institutions accredited by the Accrediting Council-like Bristol—to participate in federal student aid programs. In the fall of 2014, Bristol applied to the Accrediting Council for renewal of its accreditation. In the course of its accreditation review, the Accrediting Council identified numerous deficiencies in Bristol's operations. After Bristol was unable to remedy all of the identified deficiencies, the Accrediting Council denied Bristol's for renewal and withdrew application Bristol's accreditation.

Bristol's complaint alleges that, in withdrawing Bristol's accreditation, the Accrediting Council failed to comply with its own procedures and policies, as well as with procedures and policies for federally recognized accrediting agencies set forth in the *Higher Education Act*, 20 U.S.C. § 1099b, and 34 C.F.R. §§ 602.16, 602.25. To that end, Bristol's complaint asserted two causes of action.¹ First, Bristol alleged that the

¹ Bristol also sought declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201 et seg. The majority rightly notes that the Declaratory Judgment Act does not "create[] any substantive rights" or provide a standalone cause of action. CGM, LLC v. BellSouth Telecomms., Inc., 664 F.3d 46, 55-56 (4th Cir. 2011) (citing Skelly Oil Co. v. Phillips Petroleum Co., 339 U.S. 667, 671-72, 70 S. Ct. 876, 94 L. Ed. 1194 (1950)); see also Skelly Oil, 339 U.S. at 671 (explaining that the Declaratory Judgment Act "is procedural only" and "did not extend [federal courts'] jurisdiction" (internal quotation marks omitted)). Accordingly, Bristol's claim under the Declaratory Judgment Act only entitles Bristol to a particular type of relief in the event that either or both of its substantive causes of action succeed on the merits. "Stated differently, '[a] request for declaratory relief is barred to the same extent that the claim for substantive relief on which it is based would be barred." CGM. LLC, 664 F.3d at 55-56 (alteration in original) (quoting Int'l Ass'n of Machinists & Aerospace Workers v. Tenn. Valley Accrediting Council, in denying Bristol's application for renewed accreditation, failed to comply with the due process-like duty imposed on recognized accrediting agencies, in violation of federal common law. See <u>Prof!</u> Massage Training Ctr., Inc. v. Accreditation All. of Career Sch. & Colls., 781 F.3d 161, 169 (4th Cir. 2015). Second, [*20] Bristol alleged that the Accrediting Council was negligent per se in denying Bristol's application for renewed accreditation, in violation of certain provisions of the <u>Higher Education Act</u>, 20 U.S.C. § 1099b, and its implementing regulations. The district court granted the preliminary injunction and stay based on Bristol's federal common law claim.

After the Accrediting Council filed its appeal of the district court's order, the Department of Education terminated its recognition of the Accrediting Council as a national accrediting agency. Although the Accrediting Council appealed the Department of Education's decision, the Department of Education denied that appeal. The Accrediting Council is challenging the Department of Education's decision in court, Accrediting Council for Indep. Colls. & Sch. v. U.S. Dep't of Educ., No. 1:16-cv-02448-RBW (D.D.C.), but, as it stands, the Accrediting Council is not a recognized accrediting agency for purposes of the Higher Education Act. The Accrediting Council's loss of federal recognition calls into question the justiciability of Bristol's claims.

11.

"Mootness has been described as the doctrine of standing set in a time frame." Arizonans for Official English v. Arizona, 520 U.S. 43, 68 n.22, 117 S. Ct. 1055, 137 L. Ed. 2d 170 (1997) (internal quotation [*21] marks omitted). Accordingly, a case can become moot due either to a change in facts or a change in law that undercuts a plaintiff's basis for asserting standing. See Simmons v. United Morta. & Loan Inv., LLC, 634 F.3d 754, 763 (4th Cir. 2011). "[T]o satisfy Article III's standing requirements, a plaintiff must show (1) it has suffered an 'injury in fact' . . .; (2) the injury is fairly traceable to the challenged action of the defendant; and (3) it is likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision." Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC), Inc., 528 U.S. 167, 180-81, 120 S. Ct. 693, 145 L. Ed. 2d 610 (2000). Due to the Accrediting Council's loss of federal recognition, neither of Bristol's two causes of action provide a basis to redress Bristol's alleged injury. As a result, Bristol lacks standing to continue pursuing its

claims against the Accrediting Council, and the present action is thus moot.

The district court awarded Bristol preliminary injunctive relief based on the Accrediting Council's alleged violation of the federal "common law duty on the part of quasi-public private . . . accreditation associations to employ fair procedures when making decisions affecting their members." Prof'l Massage, 781 F.3d at 169 (internal quotation marks omitted). This Court first recognized such a duty in Professional Massage Training Center, Inc. v. Accreditation Alliance of Career Schools & Colleges, 781 F.3d 161 (4th Cir. 2015). This common law "duty was meant to operate as a 'check [*22] on organizations that exercise significant authority in areas of public concern such as accreditation and professional licensing." Id. at 170 (quoting Thomas M. Cooley Law Sch. v. Am. Bar Ass'n, 459 F.3d 705, 712 (6th Cir. 2006)). In recognizing the common law duty, we emphasized that, though they serve important public functions, "[a]ccreditation agencies are private entities, not state actors, and as such are not subject to the strictures of constitutional due process requirements." Id. at 169 (emphasis added).

Nonetheless, we identified several reasons for imposing a common law due process-like duty on federally recognized accrediting agencies. Id. at 170. First, in the Higher Education Act, Congress "delegated accreditation agencies a decisionmaking power that affects student access to federal education funding." Id. In particular, accreditation by a recognized accrediting agency is required for institutions of higher education to access federal student aid funding. See 20 U.S.C. § 1002(a), (b)(1)(D) (defining an "institution of higher education" as, in part, an institution "accredited by a nationally recognized accrediting agency association"); id. § 1070a(a)(1) (requiring students who receive federal Pell grants to be "in attendance at an institution of higher education"); id. § 1087aa(b) (allowing "an institution of higher education" to make [*23] federal Perkins loans to eligible students); see also Prof'l Massage, 781 F.3d at 170 ("Accreditation . . . is a prerequisite to Title IV funding and it provides assurance that the federal loans and grants are awarded to students who will get the education for which they are paying."). As a result, "accreditation agencies . . . serve an important quasi-public role in the dispersal of federal student aid funding." Prof'l Massage, 781 F.3d at 171. Namely, the Department of Education "rel[ies] on a number of select nationally recognized accrediting agencies that the Secretary of Education

deems to be 'reliable authorit[ies] regarding the quality of the education or training provided by' schools" to ensure that the institutions that receive federal student aid funding are educating their students appropriately. *Id.* (second alteration in original).

A second "underpinning" of our recognition of this federal common law duty is "the fact that Congress has given exclusive jurisdiction to United States district courts over" certain disputes between institutions of higher education and nationally recognized accrediting agencies. Id. at 170. In particular, the Higher Education Act provides that "any civil action brought by an institution of higher education seeking accreditation from, [*24] or accredited by, an accrediting agency or association recognized by the Secretary . . . and involving the denial, withdrawal, or termination of accreditation of the institution of higher education, shall be brought in the appropriate United States district court." 20 U.S.C. § 1099b(f). Congress's decision to vest exclusive jurisdiction in federal courts over this class of disputes "necessarily implies the application of federal law" and supports the imposition of a federal common law due process-like duty on recognized accrediting agencies. Prof'l Massage, 781 F.3d at 170 (internal quotation marks omitted) (quoting Chi. Sch. of Automatic Transmissions, Inc. v. Accreditation All. of Career Sch. & Colls., 44 F.3d 447, 449 (7th Cir. 1994)).

In sum, the common law duty under which Bristol sought and obtained relief has as its foundation the unique role occupied by recognized accrediting agencies by virtue of their status as government-approved authorities on the quality of educational institutions and gatekeepers for federal education funding. *Id. at 169-70*. And Congress's desire for federal law to govern alleged violations of this duty is further confirmed by language in the *Higher Education Act* providing that such agencies will be subject to federal jurisdiction in civil actions brought by institutions that have or seek those agencies' accreditation. *Id. at 170*.

In this case, however, [*25] the Department of Education's decision to terminate its recognition of the Accrediting Council as a national accrediting agency removed the essential legal predicates underlying Bristol's federal claims against the Accrediting Council. See id. In particular, the Accrediting Council no longer has the power, delegated by Congress through the Higher Education Act, to make decisions "affect[ing] student access to federal education funding," eliminating the first "underpinning" of the common law duty. Id. Only accreditation by a "nationally recognized accrediting

agency or association" renders an entity an "institution of higher education," 20 U.S.C. § 1002(a), (b)(1)(D) (emphasis added), eligible to receive federal student aid funding, id. §§ 1070a(a)(1), 1087aa(b). Because the Accrediting Council is no longer a "nationally recognized accrediting agency," it no longer "serve[s] an important quasi-public role in the dispersal of federal student aid funding" or "wield[s] . . . life and death power" over Bristol based on its status as a gatekeeper to that funding. See Prof! Massage, 781 F.3d at 170-71.

Nor can the second "underpinning"—Congress's grant of exclusive federal jurisdiction—provide a basis for our recognition of the federal common law cause of action pleaded in this case. Federal district [*26] courts have exclusive jurisdiction over "any civil action brought by an institution of higher education seeking accreditation from, or accredited by, an accrediting agency or association recognized by the Secretary." 20 U.S.C. § 1099b(f) (emphasis added). This exclusive jurisdiction does not, by the express terms of the statute, extend to civil actions brought by institutions of higher education that are accredited by or seeking accreditation from agencies—like the Accrediting Council—that are not recognized by the Secretary of Education.

Additionally, in *Professional Massage*, we framed the common law duty as applying to "guasi-public private . . . accreditation associations." Prof! Massage, 781 F.3d at 169 (internal quotation marks omitted). Without the Department of Education's recognition, the Accrediting Council is no longer a "quasi-public" accreditation association. It no longer qualifies as a "reliable authority regarding the quality of the education or training provided by" colleges and schools, 34 C.F.R. § 602.16(a), and it no longer controls access to federal education funding. Indeed, due to the absence of any connection to the federal government or its activities, there is no reason to subject the Accrediting Council to the strictures of the [*27] due process-like requirements that "quasi-public" federally recognized accrediting agencies must follow and that serve as the basis for Bristol's requested relief.

Finally, the purpose behind this Court's recognition of the federal common law duty at issue would not be served by recognizing the cause of action pleaded in this case. "The duty was meant to operate as a check on organizations that exercise *significant authority* in areas of public concern such as accreditation and professional licensing." *Prof'l Massage*, 781 F.3d at 170 (emphasis added) (internal quotation marks omitted). Without the Department of Education's recognition, the

Accrediting Council cannot exercise *any* authority over an institution of higher education's access to federal funds, nor can it exercise the federal government's delegated authority in a way that "gives the public some assurance that" the schools and programs the Accrediting Council accredits are providing satisfactory education and training. *Id. at 171*.

Bristol's negligence per se action—which the district court did not rely upon in imposing the preliminary injunction—likewise only relates to federally recognized accrediting agencies. In particular, Bristol alleged that the Accrediting Council [*28] engaged in negligence per se because it did not comply with certain procedural requirements set forth in <u>Section 1099b</u>, and its implementing regulations, in deciding not to renew Bristol's accreditation. But those statutory requirements apply *only* to federally recognized accrediting agencies. Accordingly, because the Accrediting Council is no longer federally accredited, <u>Section 1099b</u> and its implementing regulations no longer govern the Accrediting Council's conduct.

In sum, the Department of Education's decision to terminate its recognition of the Accrediting Council as a nationally recognized accrediting agency eliminated any basis for relying on federal law to afford Bristol relief. Since Bristol's complaint seeks relief *only* under federal law, there is no longer any basis to redress Bristol's alleged injury. As a result, I would dismiss this case as moot.

III.

Because Bristol's action is moot, I join the majority in vacating the preliminary injunction and stay entered below. I would therefore remand this matter to the district court with instructions to dismiss this suit without prejudice. See United States v. Munsingwear, Inc., 340 U.S. 36, 39, 71 S. Ct. 104, 95 L. Ed. 36 (1950) ("The established practice of the Court in dealing with a civil case from a court in the federal system which has [*29] become moot while on its way here or pending our decision on the merits is to reverse or vacate the judgment below and remand with a direction to

dismiss.").

End of Document

²I offer no view regarding whether Bristol may base a claim for relief on another cause of action, such as a breach of contract claim under state law, or whether Bristol may refile its federal common law claim in the event that the Department of Education reinstates the Accrediting Council's recognition. I simply note that there is no cause of action currently before this Court that affords a basis for redressing Bristol's alleged harm.

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-165



May 10, 2018

ID Code 00010730(MC)

VIA E-MAIL ONLY

Wynn.Blanton@SBBCollege.edu

Mr. Wynn Blanton Santa Barbara Business College 5300 California Avenue Bakersfield, CA 93309

Subject: Student Achievement Review – Program-Level Compliance Warning through Teach Out for Good Cause

Dear Mr. Blanton:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the **Criminal Justice academic associate's degree** program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 18%, 58%, and 57% for 2017, 2016, and 2015, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than **October 14, 2018.**

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that **a good cause extension**, consistent with the Introduction to the Council Actions chapter of the Accreditation Criteria, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

In the interim, the institution/campus is required to submit Quarterly 2018 Campus Accountability Reports (CAR), to be submitted via the ACICS CAR system. Documentation to support any placement waivers may be requested by the Council, at its discretion. The 3rd Quarter CAR is due no later than August 1, 2018.

Mr. Wynn Blanton May 10, 2018 Page 2 of 2

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,	
(b)(6)	

Michelle Edwards President and CEO

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)
 - Dr. Michael Marion Jr., California Bureau for Private Postsecondary Education (michael.marion@dca.ca.gov)



May 10, 2018

ID Code 00011286(MC)

VIA E-MAIL ONLY

acicsorlando@ftccollege.edu

Mrs. Linda Roberts Florida Technical College 12900 Challenger Parkway Orlando, FL 32826

Subject: Student Achievement Review – Program-Level Compliance Warning through Teach Out for Good Cause

Dear Mrs. Roberts:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the Criminal Justice academic associate's degree program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 11%, 45%, and 50% for 2017, 2016, and 2015, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than July 23, 2018.

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that **a good cause extension**, consistent with the Introduction to the Council Actions chapter of the Accreditation Criteria, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,	
(b)(6)	
Michelle Edwards	
President and CEO	

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)

Mr. Samuel Ferguson, Commission for Independent Education, Florida Department of Education (Joey.Smith@fldoe.org)

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May 10, 2018

ID Code 00018779(BC)

VIA E-MAIL ONLY

regulatory.jackson@vc.edu

Mr. Milton Anderson President Virginia College 5841 Ridgewood Road Jackson, MS 39211

Subject: Student Achievement Review – Program-Level Compliance Warning through Teach Out for Good Cause

Dear Mr. Anderson:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the **Pbarmacy Technician certificate** program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 45% and 46% for 2017 and 2016, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than **September 1, 2018.**

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that a good cause extension, consistent with the Introduction to the Council Actions chapter of the Accreditation Criteria, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

In the interim, the institution/campus is required to submit Quarterly 2018 Campus Accountability Reports (CAR), to be submitted via the ACICS CAR system. Documentation to support any placement waivers may be requested by the Council, at its discretion. The 3rd Quarter CAR is due no later than August 1, 2018.

Mr. Milton Anderson May 10, 2018 Page 2 of 2

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincer	ely, 🤼	
(b)(6)		

Michelle Edwards President and CEO

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)
 - Ms. Kim Verneuille, Mississippi Commission of Proprietary School and College Registration (kverneuille@mccb.edu)



May 10, 2018

ID Code 00023740(BC)

VIA E-MAIL ONLY

Aub-Compliance@southerntech.edu

Ms. Leeann Campbell
Onsite Administrator
Southern Technical College - Auburndale
344-396 Havendale Boulevard
Auburndale, FL 33823

Subject: Student Achievement Review – Program-Level Compliance Warning through Teach Out for Good Cause

Dear Ms. Campbell:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the **Applied Electronics Technology academic associate's degree** program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 42% and 50% for 2017 and 2016, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than **October 14**, **2018**.

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that **a good cause extension**, consistent with the Introduction to the Council Actions chapter of the *Accreditation Criteria*, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

In the interim, the institution/campus is required to submit Quarterly 2018 Campus Accountability Reports (CAR), to be submitted via the ACICS CAR system. Documentation to support any placement waivers may be requested by the Council, at its discretion. The 3rd Quarter CAR is due no later than August 1, 2018.

Ms. Leeann Campbell May 10, 2018 Page 2 of 2

President and CEO

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,			
(b)(6)			
Michelle Fo	dwards	<u> </u>	

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)

Mr. Samuel Ferguson, Commission for Independent Education, Florida Department of Education (Joey.Smith@fldoe.org)



May 10, 2018 ID Code 00041407(BC)

VIA E-MAIL ONLY

regulatory.batonrouge@vc.edu

Mr. William Wells Campus President Virginia College 9501 Cortana Pl. Baton Rouge, LA 70815

Subject: Student Achievement Review - Program-Level Compliance Warning through Teach Out for Good Cause

Dear Mr. Wells:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the Healthcare Reimbursement academic associate's degree program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 42%, 40%, and 56% for 2017, 2016, and 2015, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than July 31, 2018.

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that a good cause extension, consistent with the Introduction to the Council Actions chapter of the Accreditation Criteria, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,	
(b)(6)	
Michelle Edward	S
President and CE	O

Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education c: (aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)

Ms. Carol Marabella, Louisiana Board of Regents (carol.marabella@la.gov)



May 10, 2018

ID Code 00171025(BC)

VIA E-MAIL ONLY

regulatory.mcallen@brightwood.edu

Ms. Leticia Ventura Campus Director Brightwood College 1500 South Jackson Road McAllen, TX 78503

Subject: Student Achievement Review - Program-Level Compliance Warning through Teach Out for Good Cause

Dear Ms. Ventura:

The Council has reviewed the final program information as reported on the campus's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the **Criminal Justice academic associate's degree** program continues not to meet the Council's standard of 60% for placement, having reported placement outcomes of 21% and 57% for 2017 and 2016, respectively.

The Council has also taken under consideration that the campus has completed the application to cease all instructional activity in this program no later than July 2, 2018.

Council Action

Therefore, while the appropriate student achievement enforcement action should be a withdrawal of program approval, consistent with the guidelines of Appendix L, the Council determined that a good cause extension, consistent with the Introduction to the Council Actions chapter of the Accreditation Criteria, is warranted to facilitate a program train out that serves the best interest of the students still enrolled. The expectation remains that these students will be provided with career services and other resources beyond their completion as the campus honors its responsibility in this regard.

If you have any questions about this action, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,	
(b)(6)	
Michelle Edwards	
President and CEO	

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)

Ms. Cathie Maeyaert, Texas Higher Education Coordinating Board (cathie.maeyaert@thecb.state.tx.us)

Texas Workforce Commission (Career.schools@twc.state.tx.us)

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Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-166

Accrediting Council for Independent Colleges and Schools

TYPICAL POLICY DEVELOPMENT AND IMPLEMENTATION PLAN

Voted by the Council on December 11, 2014

<u>Introduction:</u> There is a need for the Council to manage policy development and implementation in a more systematic manner. The crafting of policy statements requires much research and input from experts, Council staff, institutional representatives and Commissioners. This document provides a proposed general pattern for policy development and implementation. Deviations may be necessary if regulatory requirements are involved.

Major Events	Recommended Activities
FEBRUARY POLICY COUNCIL	 Identify need for new or revised standards and criteria Consider input from the field on systematic review of criteria Assemble Commissioners' initial input to the crafting of new criteria Establish ad hoc committees if needed and assign staff to coordinate research and development of proposed policy Unless required to meet regulatory deadlines, refrain from voting any final criteria Note: Eliminate need for a Memorandum to the Field following the February Policy Council.
APRIL COUNCIL SESSION	 Present Policy Discussion proposals Get Council and staff input and revise proposals accordingly Present supporting research data and impact analysis Note: Utilize Webinars and/or other publications to communicate major topics under consideration, not for publication of proposed policies.
AUGUST COUNCIL SESSION	 Present <u>Policy Decision</u> proposals Vote on proposals for publication in the Memorandum to the Field <u>Note:</u> Conduct webinar(s) to clarify or answer any questions concerning the proposed standards.
DECEMBER COUNCIL SESSION	 Analyze input from the field on proposed criteria Revise proposed policy as needed, based on public input Vote on final criteria and identify effective dates Note: Revise Evaluator Templates and quality assurance processes. Train staff, evaluators and chairs.
Publication of the Annual ACICS Accreditation Criteria and Effective Dates for Policy Implementation	 Publish the annual ACICS Accreditation Criteria for the new year in January and clearly identify effective dates Designate JULY 1 following the December Council as the general effective date of new or revised Criteria Note: Council may vote an extra year's lead time for selected policies—July 1 of the following year.

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-168

From: carolyn prager

To: info

Subject: Letter for President Michelle Edwards Date: Thursday, September 14, 2017 10:24:40 AM

Attachments:

letter to M. Edwards.docx CAROLYN PRAGER resume short.docx

It would be appreciated if the enclosed letter and supporting material were redirected to the attention of President Edwards.

Hard copies have also been directly mailed.

Thank you. Carolyn Prager

175 W. 93rd St., apt. 16J New York, NY 10025 212.865.1780

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(b)(6)	@gmail.com / (b)(6)	@gmail.com

September 14, 2017

Michelle Edwards President ACICS 750 First Street NE Suite 980 Washington, DC 20002-4223

Dear President Edwards:

I am pleased to learn that ACICS will apply for Department of Education Recognition As A National Accreditor.

I have served on several ACICS site evaluation teams over the years, primarily as the General Education and ESL team evaluator. A review of your files would confirm my past discussions with members of the executive staff about ways in which the Standards applying to General Education and ESL might be reworked.

I would like to work with ACICS in a revision of these standards. As the attached resume indicates, I have broad faculty and senior administrative experience at a variety of non-degree granting and degree granting postsecondary institutions, at state postsecondary policy agencies, and on both regional and national accreditation teams.

Please contact me if I might serve in some capacity that would assist in moving ACICS forward.

Sincerely,

Carolyn Prager, Ph.D.

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-169

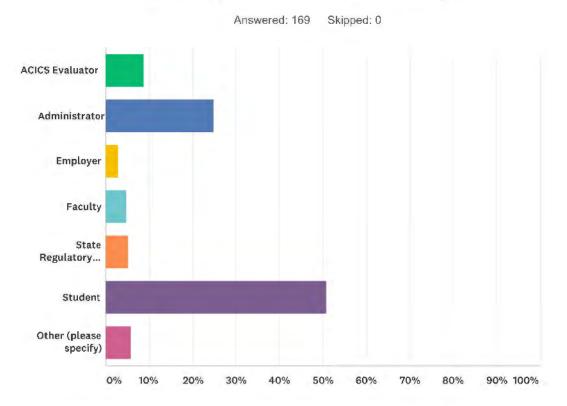
Review Period	Issue	Criteria	Suggested Ad Hoc	Memo-to-the-Field Survey Feedback	Guidance (What problems are we looking to solve?)
2018	Distance Education	Appendix H	-Pam Bennett (Online and Library Ed Consultant/ABHES DE Specialist) -Andrea Olson (Previous Director of Research and Development to include online courses/programs) -Fawzie Ben Massoud(Online instructor w/background in multiple DE positions) -DEAC Recommendation	-we need to acknowledge changing technology by allowing for more innovative approaches	-Clean-up of outdated language and content -Targeted survey for specific feedback -Consideration regarding retention
2018	English as a Second Language	Appendix F	-Carol Prager (ESL program/course development) -Bobbijo Pinnelli(ESL Instructor/Director of Gen Ed.) -Charlie Matterson(ACCET Commissioner/Previous Director of Program Operations-American Language Academy)	-more flexibility for qualified through experience	-Clean-up of outdated language and content -Targeted survey for specific feedback
2018	International/Government /Military Institutions	TBD	-lan Harazduk (Compliance Officer for ACICS institution in Denmark) -Ezer Tossas (Consultant for several international institutions) -Billy Ferrell(Previous Academic Dean and Developer of Bilingual Training for international franchises)	-N/A	-Explore model similar to that of DEAC?

2019	Academic Associate's Degree and Bachelor's Degree	Section 3- 4s and 3-5s		
2019	Occupational Associate's Degree	Section 3- 3s		
2019	Certificate/Diploma Level	Section 3- 2s		
2020	Standards for All Institutions	Section 3- 1s		
2021	CEP	Appendix K		
2021	Publications	Appendix C		
2021	Satisfactory Academic Progress	Appendix D		
2021	Guidelines for Institutionally Funded Student Aid	Appendix E		
2022	Nontraditional Education	Appendix H		
2022	International Partnership Agreements	Appendix I		
2022	Program Enhancement Education and Study Abrooad	Appendix J		

Review Period	Issue	Criteria	Suggested Ad Hoc	Memo-to-the-Field Survey Feedback	Guidance (What problems are we looking to solve?)
2018	Distance Education	Appendix H	-Pam Bennett (Online and Library Ed Consultant/ABHES DE Specialist) -Andrea Olson (Previous Director of Research and Development to include online courses/programs) -Fawzie Ben Massoud(Online instructor w/background in multiple DE positions) -DEAC Recommendation	-we need to acknowledge changing technology by allowing for more innovative approaches	-Clean-up of outdated language and content -Targeted survey for specific feedback -Consideration regarding retention
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2019	Academic Associate's Degree and Bachelor's Degree	Section 3- 4s and 3-5s		
2019	Occupational Associate's Degree	Section 3- 3s		
2019	Certificate/Diploma Level	Section 3- 2s		
2020	Standards for All Institutions	Section 3- 1s		
2021	CEP	Appendix K		
2021	Publications	Appendix C		
2021	Satisfactory Academic Progress	Appendix D		
2021	Guidelines for Institutionally Funded Student Aid	Appendix E		
2022	Nontraditional Education	Appendix H		
2022	International Partnership Agreements	Appendix I		
2022	Program Enhancement Education and Study Abrooad	Appendix J		

Q1 Are you one of the following?



ANSWER CHOICES	RESPONSES	
ACICS Evaluator	8.88%	15
Administrator	24.85%	42
Employer	2.96%	5
Faculty	4.73%	8
State Regulatory Agency	5.33%	9
Student	50.89%	86
Other (please specify)	5.92%	10
Total Respondents: 169		

Q2 Please review and propose any modifications, deletions, additions, or updates to the following areas under the Requirements for English as a Second Language (Appendix F) in the ACICS Accreditation Criteria (page 118):

Answered: 6 Skipped: 163

ANSWER CHOICES	RESPONSES	
Admissions criteria/requirements	66.67%	4
Entrance/exit examination requirements	66.67%	4
Faculty qualifications	83.33%	5
Clock or credit hour requirements	50.00%	3
Evaluation of ESL courses as part of another program	66.67%	4

Q3 Please review and propose any modifications, deletions, additions, or updates to the following areas under the Principles and Requirements for Nontraditional Education: Distance Education (Appendix H: Section II) in the ACICS Accreditation Criteria (page 124):

Answered: 6 Skipped: 163

RESPONSES	
KESI ONOES	
50.00%	3
66.67%	4
50.00%	3
66.67%	4
50,00%	3
50.00%	3
66.67%	4
	66.67% 50.00% 66.67% 50.00%

Q4 Please review and propose any modifications, deletions, additions, or updates to the following areas under the Evaluation Standards for nondegree, occupational associate's degree, academic associate's degree, bachelor's degree, and master's degree programs (Title III, Chapters 2, 3, 4, 5, 6) in the ACICS Accreditation Criteria (page 60). Be sure to identify the credential level(s) you are referring to:

Answered: 6 Skipped: 163

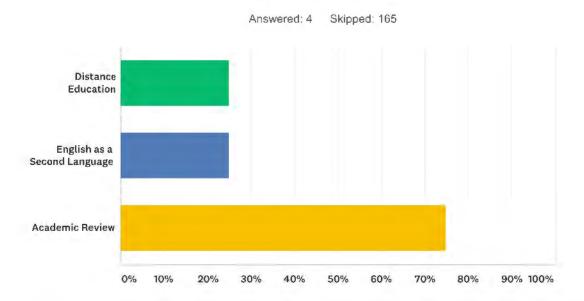
ANSWER CHOICES	RESPONSES	
The amount of credits required	66.67%	4
Faculty qualifications	66.67%	4
Appropriate teaching loads	33.33%	2
Appropriate ratio of full- to part-time instructors	50.00%	3
How to evaluate qualitative and quantitative comparability of the curriculum	50.00%	3
Internship/externship requirements	66.67%	4

Q5 ACICS is developing standards for the evaluation of short-term programs that have an occupational outcome (i.e. phlebotomy, home health aide) and would like to obtain additional feedback from the field regarding the following:

Answered: 2 Skipped: 167

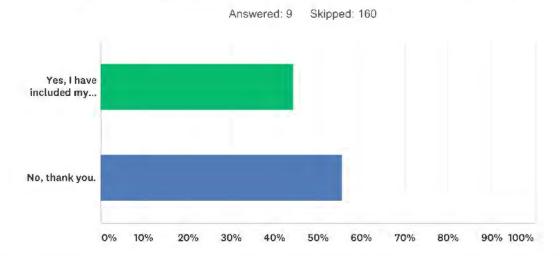
ANSWER CHOICES	RESPONSES	
Measuring student achievement program outcomes	100.00%	2
Curriculum evaluation	100.00%	2
Faculty qualifications	100.00%	2

Q6 Would you be interested in serving any of the following ad hoc committees?



ANSWER CHOICES	RESPONSES	
Distance Education	25.00%	1
English as a Second Language	25.00%	1
Academic Review	75.00%	3
Total Respondents: 4		

Q7 Thank you for your participation! May we contact you if we need further clarification on any of your responses?



ANSWER CHOICES	RESPONSES	
Yes, I have included my contact information below.	44.44%	
No, thank you.	55.56%	5
TOTAL		9



POLICY MEETING MINUTES

February 20 – 21, 2018 Orlando, FL

Council Members

Ms. Libby Guinan, Chair

Mr. Roger Swartzwelder, Vice Chair

Dr. Larry Leak

Mr. John Euliano

Mr. Rick Bennett

Dr. Fardad Fateri

Dr. Adriene Hobdy

Ms. Tibby Loveman

Dr. Judee Timm

Staff Attendees

Ms. Michelle Edwards, President

Mr. Steven Gelfound

Ms. Perliter Walters-Gilliam

Ms. Karly Zeigler

- I. <u>CALL TO ORDER</u>: Chair Guinan called the meeting to order at 9:06 a.m. on Tuesday, February 20, 2018.
- II. <u>OLD BUSINESS</u>: Staff presented Campus Accountability Placement Student Achievement data for campuses and programs. Campuses were given an additional 4 months to submit placement data after allowance of submission of documentation for non-responders through the Placement Verification Program (PVP). Several schools still submitted incomplete or incorrect data on their Campus Accountability Reports (CARs). Such errors included:
 - 1. Completers/grads not equal to waivers/placed/not placed
 - 2. C/G counted as placed but not on PVP
 - 3. C/G counted as placed but not validated on PVP

What action should we take for those institutions with data discrepancies? Staff recommendation is show-cause based on data integrity(See Exhibits A & B).

The Council discussed the need for adequate training for institutions if we have more than 10% that cannot submit correctly. Additionally, due to this being the first time we have begun error checking for these particular errors stated above, schools may not be accustomed to the error reports.

MOTION: Send letters including written instructions of how to correct issues to schools allowing 10 days to fix data or otherwise show-cause, not copied to outside agencies.

MOVED: Euliano SECOND: Loveman ACTION: Passed POLICY/Feb.2018/Minutes

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*Council further discussed the analysis done through the PVP and directed staff to compose a panel to address PVP concerns and increase confidence based on non-responses. Bring discussion to August meeting.

MOTION: Continue CW from 2016: 9 schools and remove 4 from compliance warning for

retention (See Exhibit C)

MOVED: Leak SECOND: Hobdy ACTION: Passed OPPOSED: Fateri

MOTION: Accept five Daymar campus's revised retention on their CAR

MOVED: Loveman SECOND: Euliano ACTION: Passed

MOTION: Accept Daymar's program-level retention reconsideration

MOVED: Loveman SECOND: Leak ACTION: Passed

MOTION: Acknowledge rates for Puerto Rico Schools as reported on the 2017 CAR, but refrain from taking action until the 2018 reporting year, due to mitigating circumstances of natural

disasters.

MOVED: Swartzwelder

SECOND: Leak ACTION: Passed

III. Institutional Requests for Consideration

Texas Health and Science University: Requesting to split into two separate institutions (See

Exhibit D)

MOTION: Do not allow, but may allow them to enter 2nd institution as possibly an initial

applicant.

MOVED: Leak

SECOND: Loveman.

ACTION: Unanimously Passed.

Brookline: Had one visit this cycle already, but are requesting one-year extension, through

December 2018.

MOTION: Accept the request

MOVED: Fateri SECOND: Leak: ACTION: Passed POLICY/Feb.2018/Minutes Page 3 of 20 February 20-21, 2018

OPPOSED: Hobdy

Laurus: Requesting ACICS withdrawal SC/adverse actions on the programs being taught out.

MOTION: Deny the request.

MOVED: Bennett SECOND: Loveman

ACTION: Unanimously Passed

IV. Systematic Review Ad Hoc Reports

A. Distance Education Ad Hoc-

The Distance Education Ad Hoc Committee, consisting of Ms. Pam Bennett, Dr. Fawzi BenMessaoud, Dr. Andrea Olson, and Commissioner Leak, met over the phone to review ACICS *Criteria* applicable to distance education, primarily Appendix H, Section II, in regards to the currency and appropriateness of the standards. Other sections provided to the committee for review included 2-2-106; 3-1-512; 3-1-516; relevant glossary definitions; and Appendix C, #25.

The committee discussed the following major themes:

- Orientation to distance education Students are too often unfamiliar with the
 expectations of being an online student. They need to have more of an orientation to such
 expectations and practices, not just an orientation to the school's learning management
 system, and this should be enforceable through the Criteria.
- Online support for students and faculty Students and faculty have available to them the
 help desk of the LMS platform, but there should be procedures in place (and standards
 requiring such) for the school (who is actually familiar with the courses) to provide
 support to students taking online courses and faculty administering them a sort of
 documented system of conflict resolution/tech support with a required response time (i.e.
 within 1 business day). The committee also discussed how schools should have a
 procedure or system for the disaster recovery of information the school has in its LMS.
- Training and evaluation of online faculty Faculty who teach online courses or have an online component of their courses also need instruction on how to teach via distance education (and what the expectations for them are), similar to how students are often only oriented to the LMS. Online faculty should be required to have ongoing training, through in-service activities or otherwise, on the online environment. In addition, faculty should be evaluated on their courses normally but also in regards to the online component of the course (such as oversight of discussion threads, etc.)

One committee members supplied potential revisions to the provided *Criteria* sections, and her recommendations are indicated on the revised Criteria for DE.

Council reviewed and advised staff to review ABHES standards for consideration of standards and recommendations for August meeting.

- B. English as a Second Language(ESL): With significant changes having taken place by the federal government (DHS) concerning the SEVIS approval granted to institutions to accept foreign students for the purpose of language instruction, ACICS included in its 2018 Systematic Review process the overhauling of its current standards concerning this area. In addition to soliciting feedback from the field, the Council also established an Ad Hoc Committee to provide focused expertise for its review. The committee included the following members:
 - 1. Dr. Carol Prager: ESL Expert, Former ESL Program Director, and ACICS ESL Evaluator
 - 2. Ms. Bobbi Jo Pinnelli: ESL Expert and ACICS ESL Evaluator
 - 3. Mr. Charles Matterson: ESL Expert and Former ACCET Deputy Executive Director
 - 4. Dr. Adriene Hobdy: ACICS Commissioner
 - 5. Ms. Perliter Walters-Gilliam: ACICS Staff Liaison

Following its meeting on Monday, January 29, 2018, which included the review of the ACCET revised standards, the Committee recommends that the ACICS Council completely revises Appendix F to be aligned and current with expectations in the field.

Council raised the question as to whether ACICS should continue evaluating ESL. Council directed not to forgo the review, but to reevaluate the extent. Not all programs are short-term preparatory...when part of the program, may be Title IV eligible. Update and research to bring before August.

C. <u>Standards applicable to international institutions</u>: The ad hoc committee recommended a comparison of the approach taken by other agencies, to be brought to the Council, so that they may decide on an approach. To incorporate the objectives stated above, substantial changes would need to be made to Criteria, and therefore Council direction is needed. The following is a comparison among other agencies approaches to international education.

Agency	Approach	Notes	
DEAC	-Includes a separate subsection of Criteria under "Substantive Changes: Engaging in Federal Student Assistance Title IV Programs"	-Majority of the standards in the subsection defer to Title IV FSA standardsAn institution must first be "certified" by the agency via an application and training	
	-There is an additional subsection for "Engaging in International Activity," which includes an	proceduresInstitution must show additional compliance with SAP, DE interactions, Career and	

	application, documented compliance and approvals from home country higher education system and governing bodies.	FA Advising, Loan E & E Advising, Disclosures, Recruitment, Refund Policy, FSA Administrator, Default Management Plan, Program Reviews, Bankruptcy, Renewal of Accreditation	
ACCSC	No differentiation of standards for international institutions.		
WASC	-Separate standards and application processEligibility, self-study, visit process, etc is all different for international.	-Core "beliefs" are basis for all standards across all institutionsInternational schools must offer programs similar in nature to American education.	
ACCET	No differentiation of standards for international and no reference.		
COE	Separate Handbook of Accreditation for federal institutions, but no apparent separate standards for international institutions.		

Table until April and put on agenda with contingency plans.

V. POLICY DISCUSSION

A. Policies and Procedures for Determining Credit Hours

CONSIDERATION: Editorial STAFF: Zeigler

ISSUE/OBJECTIVE:

Staff proposes the following revision to provide clarification. The revision is editorial and should not change the intent or spirit of the criterion.

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CRITERIA

3-1-516. Course and Program Measurement. The Council recognizes that institutions must provide for their students a learning environment in which achievement is encouraged. It further recognizes the legitimacy of both traditional (e.g., lecture/laboratory/externship) and nontraditional (e.g., distance education or independent study) educational delivery methods. A framework for transfer of credit and consistent application of academic credit awards should apply to all of these varied forms of educational delivery.

Institutions, therefore, must demonstrate in their written policies and procedures for determining credit hours, a knowledge of appropriate academic course and program measurement, and correct application of the measurement.

OPTIONS

- 1. Vote to approve for publishing in the May Memo to the Field.
- 2. Vote to amend the policy and bring before the Council in April:
- Recommend a different approach to policy issue as stated below:
- Remove from further consideration.

RECOMMENDATION: Option: #1

MOVED: Commissioner Bennett moved to accept option 1 as proposed.

SECONDED: Commissioner Leak moved to second the motion

ACTION: Passed

ABSTENTION: N/A

B. Change of ownership and change of control

CONSIDERATION: Proposed STAFF: Gelfound

ISSUE/OBJECTIVE: Clarification needed between change of ownership and change of control.

RESEARCH:

Reviewed ACCSC and ACCET definitions of Change of Control

Proposed Definition:

A Change of Control would be any of the following:

- A transfer of ownership interest within an immediate family.
- Non-profit Organizations: A 50% change of the Board of Directors (or a 50% change in 24-month period) or fundamental change to its governance structure.
- Public companies: Any change of 25% or more of voting stock

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Proposed Application Requirements:

- Name, address, and contact information for new family ownership, Board of Directors, or recipients of stock.
- · Who they are replacing
- · New governance structure
- Any contracts related to the change of stock, the previous breakdown of stock ownership, and the current breakdown of stock ownership

CRITERIA

2-2-401. Change of Ownership or Control.

A change of ownership or control generally means that a transaction has occurred whereby a new person, combination of persons, or entity can exercise control of a corporation or limited liability company as described in Section 2-2-400. The following subsections outline the typical changes of ownership or control of the three types of corporations that own accredited institutions, including corporate general partners in limited partnerships, and limited liability companies. Transactions other than those outlined below, however, may constitute a change of ownership or control, and the Council reserves the right in its discretion to make the determination of whether a change of ownership or control has occurred in all cases. Institutions, therefore, must keep the Council informed of all substantive changes in the ownership of stock and the composition of the board of directors. In addition to the transactions outlined below, any change from one type of entity to another as defined in Section 2-2-400 constitutes a change of ownership or control. Institutions also are reminded that nonmain campuses cannot be bought or sold independently of their main campus. (a) Privately held corporation. A change of ownership or control of a privately held corporation occurs as a result of any of the following transactions: (i) the transfer of 50% or more of the total outstanding voting stock from one party or parties to another party or parties; (ii) a transfer of voting stock that results in the ownership of 50% or more of the total outstanding voting stock by any party other than any previous owner of 50% or more of the total outstanding voting stock; (iii) a transfer of voting stock whereby a stockholder's ownership of outstanding voting stock decreases from more than 50% to 50% or less, or from 50% to less than 50%; or (iv) any other transaction whereby a stockholder or group of stockholders who previously could not exercise control of the corporation as described in Section 2-2-400(a) now can exercise control. (b) Privately held corporation. A change of control of a privately held corporation occurs as a result of a transfer of ownership interest within an immediate family. (cb) Publicly traded corporation. A change of ownership or control of a publicly traded corporation occurs as a result of any of the following transactions or events: (i) the change of 50% or more of the voting members of the board of directors in any rolling, 12- month period; (ii) a change in the number of voting members of the board of directors in any rolling, 12-month period that will allow a group of directors to exercise control who could not exercise control before the change; (iii) the acquisition of outstanding voting shares by any entity whereby that entity owns 50% or more of the total outstanding voting shares; or (iv) any other transaction that is deemed by an appropriate governmental agency to constitute a change of control, including but not limited to a transaction that requires the corporation to file Form 8-K with the Securities and Exchange Commission of the United States, (d) A change of control of a publicly traded corporation occurs

as a result of any change of 25% or more of voting stock. (ee) Not-for-profit corporation. A change of control of a not-for-profit corporation occurs as a result of any of the following occurrences: (i) the change of 50% or more of the voting members of the board of directors in any rolling, 12- month period; or (ii) a change in the number of voting members of the board of directors in any rolling, 2412-month period that will allow a group of directors to exercise control who could not exercise control before the change. (iii) A fundamental change to its governance structure (fd) Limited partnership with corporate general partner. A change of ownership or control of a limited partnership with a corporate general partner occurs when the corporate general partner has undergone a change of ownership or control as defined in subsection (a), (b), (c), (d) or (ee) above. (ge) Limited liability company. A change of ownership or control of a limited liability company occurs as a result of any of the following transactions: (i) the transfer of 50% or more of the direct or beneficial ownership interest from one member or members to another member or members; (ii) a transfer of direct or beneficial ownership interest that results in the holding of 50% or more of the total direct or beneficial ownership interest by any member other than any previous member who owned 50% or more of the total direct or beneficial ownership interest; (iii) a transfer of direct or beneficial ownership interest whereby a member's direct or beneficial ownership interest decreases from more than 50% to 50% or less, or from 50% to less than 50%; or (iv) any other transaction whereby a member or group of members who previously could not exercise control of the company as described in Section 2-2-400(e) now can exercise control. A change of ownership or control also occurs when ownership or control of the primary assets of an institution or the authority to operate an institution is transferred from the controlling corporation, limited partnership, or limited liability company to another corporation, limited partnership, or limited liability company. A change of ownership-or control, however, has not occurred when there is a transfer of assets among wholly owned subsidiary corporations or between a wholly owned subsidiary corporation and its parent corporation; a transfer of assets from a subsidiary corporation to its parent corporation where the parent corporation owns a majority of the outstanding stock of the subsidiary corporation; or a transfer of assets among subsidiary corporations where the common parent owns a majority of the outstanding stock of the subsidiary corporations. (h) Limited liability company. A change of control of a limited liability company occurs as a result of 49% or less change in officers (or whatever term is used in the operating agreement) The Council, for purposes of determining ownership or control, views married couples as a single entity, and it views closely related family groups as a single entity in most cases where all of the present and future relevant stockholders actively participate in the management of the corporation. No change of ownership occurs when stock is transferred to a close family member by operation of law or inheritance upon the death of one of the stockholders.

OPTIONS

- 5. Vote to approve for publishing in the Memo to the Field
- 6. Vote to amend the policy and bring before the Council in August:
- 7. Recommend a different approach to policy issue as stated below:
- 8. Remove from further consideration.

RECOMMENDATION: Option #2

MOVED: Commissioner Hobdy moved to accept option 2

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SECONDED: Commissioner Leak moved to second the motion

ACTION: Passed

ABSTENTION: N/A

AMMENDMENTS/GUIDANCE:

- -Review the Department of Education definition out of the FSA handbook and apply to revisions.
- -Review other agencies' definitions.
- -Consult with Katherine Brodie (external council) on legal implications.

C. DENIAL OF ACCREDITATION - IMMEDIATE EXPIRATION

CONSIDERATION: Proposed STAFF: Zeigler

ISSUE/OBJECTIVE:

Staff is proposing criteria revisions to allow for an immediate termination of accreditation following a final denial action. Currently, the Criteria allows for a campus that has been denied a renewal of accreditation or inclusion to remain accredited through the end of the year. However, if a denial action takes place, presumably the action is being taken due to severe or prolonged non-compliance with Council Standards, which may be negatively impacting the students. Therefore, it should not be acceptable for the institution to remain under ACICS accreditation for several more months, rather there must be a provision for terminating their accreditation status, immediately following due process.

Additionally, under Section 2-3-302, there is a statement allowing for a show-cause *following* a denial action, which is no procedurally accurate.

Staff recommends the following changes: issuing a summary suspension in the cases of a denial of a renewal of accreditation or denial of reinstatement following a change of ownership. As aligned with other references to summary suspension under 2-2-301(regarding campus closures) and 2-3-401 (b), a summary suspension allows the institution the ten-day period to appeal the summary suspension. If they choose not to appeal, their accreditation is therefore revoked.

*Note for Staff Review: Cross-reference Institution/Campus Closure and Voluntary Withdrawal policy.

CRITERIA

2-3-300 - ACCREDITATION DENIED

Denial of an accredited status is a Council action to "withhold" accreditation, characterized by the Council as a "withholding" action and is differentiated from suspension of accreditation, which is a "withdrawal" action. There are two levels of denial. One totally withholds accreditation of the institution or a branch; the other denies approval of a requested substantive change. Denial at either level constitutes a negative action and is challengeable by the institution. The process of challenge, however, is different for each level of denial as separately described in Sections 2-3-301, 2-3-302, and 2-3-303. In all cases of denial, the Council will give the

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institution written reasons for the denial, which are subject to modification through the appeals processes as later described and explained. Denial actions that are not appealed in accordance with the appeals procedures provided by the Council are considered final actions.

2-3-301. *Denial of Initial Grant.* An institution that objects to a Council decision to deny an application for an initial grant of accreditation has the right and will be given the opportunity to present its case and to be heard by a panel of the Review Board of Appeals. At such a hearing, the institution may not present new evidence for consideration and must follow the procedures described in Section 2-3-600.

2-3-302. Denial of Renewal of Accreditation or Denial of Reinstatement of Accreditation Following Change of Ownership/Control. Upon issuing a denial of an application for a renewal of accreditation or reinstatement of accreditation following a change of ownership or control, the Council may/will issue a summary suspension of the institution's current grant of accreditation. An institution that objects to a Council decision to deny an application for a renewal of accreditation or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision within ten days to the Review Board of Appeals pursuant to the procedures described in 2-3-604.

Additionally, in cases of denial of a renewal of accreditation, or reinstatement of accreditation following a change of ownership or control, the Council may issue a show-cause directive as described in Section 2-3-230.

•••

2-3-400 - Accreditation Withdrawn

"Withdrawal of accreditation" differs from "denial of accreditation" in that denial rejects an institution's application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; A withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or inclusion withdrawn from a branch campus through two types of Council action: "revocation of accreditation" or "suspension of accreditation."

- **2-3-401.** Revocation. Revocation occurs without a hearing for any of the following reasons:
 - (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
 - (b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
 - (c) An institution or campus whose accreditation has been summarily suspended does not challenge or appeal the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
 - (d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)

(e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

2-3-402. Suspension. Suspension of accreditation may occur when, in the judgment of ACICS, an institution or one of the campuses within the institution no longer complies with the criteria.

By way of illustration, ACICS might issue an order of suspension for reasons such as the following:

- (a) The institution or any of its components (a branch or new program, for example), is evaluated as directed by ACICS and is determined not to be in compliance with the criteria
- (b) Periodic required reports filed by the institution or campus fail to conform to Council reporting requirements.
- (c) The institution or campus makes substantial or significant change, without notice to ACICS, in its operation, structure, governance, ownership, control, location, facilities, or programs of study.
- (d) The institution or campus fails to respond to or cooperate with attempts by the Council to make arrangements for a site evaluation.
- (e) The institution or campus has deviated from the criteria or other directives of ACICS.
- (f) The institution or campus fails to disclose any agreements, options, or other contractual arrangements between the institution and other parties which bear on the management or control of the main campus or its non-main campuses.

In all cases of suspension, the Council retains discretion to specify whether and under what conditions the institution might apply for an initial grant of accreditation or inclusion of a branch campus.

- **2-3-403.** *Procedural Guarantees for Withdrawal by Suspension.* In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:
 - (a) Opportunity for a review or hearing before ACICS on all material issues in controversy.
 - (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution/campus ultimately is to be judged.
 - (c) A decision on the record alone and a statement of reasons for the ultimate decision.
 - (d) A right of appeal as provided in Section 2-3-600.
 - (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

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OPTIONS

- 1. Vote to approve for publishing in the Memo to the Field
- 2. Vote to amend the policy and bring before the Council in April:
- 3. Recommend a different approach to policy issue as stated below: Approve removal of the second paragraph of 2-3-302 and place in the May Memo and seek advisement on a more extensive review and complete revision of the aforementioned criteria.
- Remove from further consideration.

RECOMMENDATION: Option 3

MOVED: Commissioner Timm moved to accept option 3. SECONDED: Commissioner Hobdy moved to second the motion

ACTION: Passed

ABSTENTION: N/A

AMMENDMENTS/GUIDANCE:

-Consider an approach that clarifies cycles of review within continuous accreditation of institutions.

D. AFR/Audit Alignment with Institution's Fiscal Year

CONSIDERATION: Proposed

STAFF: Ms. Katie Morrison

ISSUE/OBJECTIVE:

It has been brought to the Council's attention, through a financial show-cause, that there is a need to update the *Criteria* to clarify that the time period an institution utilizes for its Annual Financial Report (AFR) and audited financial statements should align with its fiscal year.

CRITERIA

- **2-1-802**. Annual Financial Report. The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data reported must align with an institution's fiscal year and must be submitted separately for each campus included in a the institution's grant of accreditation. It is due no more than 180 days after the end of the institution's fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.
- **2-1-803.** Compliance Audits and Audited Financial Statements. Title IV compliance audits and audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year, and the statements must represent the institution's fiscal year. All institutions that participate in the Title IV program are required to

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submit the compliance audit within 180 days of the end of their fiscal year. This audit must also represent the institution's fiscal year, as required by U.S. Department of Education regulations.

OPTIONS

- 1. Vote to approve for publishing in the Memo to the Field
- 2. Vote to amend the policy and bring before the Council in April:
- 3. Recommend a different approach to policy issue as stated below:

Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Hobdy moved to accept option 1 as proposed.

SECONDED: Commissioner Timm moved to second the motion.

ACTION: Passed

ABSTENTION: N/A

AMMENDMENTS/GUIDANCE: N/A

E. Voluntary Withdrawal

CONSIDERATION: Proposed

STAFF: Ms. Katie Morrison

ISSUE/OBJECTIVE:

The *Criteria* does not include a section on the process of voluntary withdrawal (aside from Article VI, Section 2 in the Bylaws), which, in correlation with the initiation (or withdrawal) of the initial application for accreditation process, should be authorized only by the chief executive or administrative officer of an institution. Section 2-3-401 also does not include voluntary withdrawal as an action which leads to revocation.

The Council may also want to discuss what verbiage is most appropriate/preferred for such an institutional request – voluntary *withdrawal*, *relinquishment or resignation* – and apply such language to any revisions/additions.

Staff has included an advisement in the recommended voluntary withdrawal section since other *Criteria* sections (such as 2-2-504) include such items, and ACICS has seen the impact of some institutions' withdrawal on their students' ability to sit for licensure exams, but this could be removed (especially if the implications are unclear given ACICS' status of recognition with the US DOE).

*Note for staff review: Please cross-reference Institution/Campus Closure Revocation Date Accuracy policy item to ensure collection of all revisions to 2-3-401. If a new section for Voluntary Withdrawal is created that proceeds 2-2-600, any references to sections 2-2-throughout the *Criteria* must be reviewed for correct new numbering.

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CRITERIA

New 2-2-400 or 2-2-500? Or additional 2-2-700?

2-2-XXX - VOLUNTARY WITHDRAWAL

If an institution seeks to voluntarily withdraw its grant of accreditation by ACICS, or the inclusion of one or more of its nonmain campuses from within its grant of accreditation, it must submit written notice to ACICS of its request. The notice must be signed by the chief executive or administrative officer of the institution, and indicate the requested date of effect. The institution's grant of accreditation will be revoked as of the effective date, or retroactive to the date that all outstanding obligations, including payment of fees, had previously been fulfilled by the institution.

Institutions are advised that implications may exist for the eligibility of their students for licensure or certification exams necessary for graduate employment, should they withdraw their institutional accreditation.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (f) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (g) An institution notifies the Council that it is voluntarily withdrawing its grant of accreditation.
- (h) (b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
- (i) (e) An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (j) (d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
- (k) (e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

ARTICLE VI

Membership, Fees, and Meetings

Section 2-Loss of Membership. Any member that ceases to be accredited by ACICS shall automatically, and without the necessity for further action, be deemed to be removed from membership. Members may voluntarily resign <u>pursuant to the procedures described in 2-2-XXX</u>, which also results in <u>a revocationloss</u> of accreditation. All obligations owed to ACICS, including

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payment of fees, shall be fulfilled prior to resignation. The loss of accreditation shall be retroactive to the date that all outstanding obligations had previously been fulfilled, if applicable.

OPTIONS

- 1. Vote to approve for publishing in the Memo to the Field
- 2. Vote to amend the policy and bring before the Council in April:
- 3. Recommend a different approach to policy issue as stated below:
- 4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Loveman moved to accept option 1 as proposed.

SECONDED: Commissioner Hobdy moved to second the motion.

ACTION: Passed

ABSTENTION: N/A

F. Initial Evaluation of Programs with No Enrollment

CONSIDERATION: Proposed STAFF: Zeigler

ISSUE/OBJECTIVE:

The following is a proposal to remove procedural language from the minimum eligibility requirements. The current language makes reference to a criterion that is somewhat misleading, and upon review, this language is procedural in nature and therefore should not be included in the Criteria.

CRITERIA

1-2-100 - MINIMUM ELIGIBILITY REQUIREMENTS

To be eligible for consideration for accreditation, an institution or entity must satisfy the following minimum requirements.

(a) It shall be either an institution of postsecondary education (as herein defined) primarily offering certificates or diplomas and postsecondary institutions offering associate's, bachelor's, or master's degrees in programs designed to educate students for professional, technical, or occupational careers; or a noninstitutional entity offering professional enhancement education.

An institution is presumed to be an institution of postsecondary education if it (1) enrolls a majority of its students in one or more programs, the content of which is on a postsecondary academic level and which leads to a postsecondary academic credential (such as a certificate, diploma, or degree) or an occupational objective; (2) enrolls

students who possess a high school diploma or its equivalent, or who are beyond the age of compulsory school attendance and demonstrate through valid assessment an ability to benefit from the educational experience; and (3) offers at least one program which is a minimum of 300 clock hours in length.

A noninstitutional entity must enroll a majority of its students in one or more programs, the content of which is on the postsecondary level or at a level which prepares the student for immediate enrollment into a postsecondary program. A noninstitutional entity is ineligible to participate in federal student aid programs or to award degrees.

- (b) It shall be legally organized; licensed by (1) the appropriate state education agency for postsecondary institutions or (2) the appropriate state agency for authorizing the conduct of business in that state for noninstitutional entities; and have offered its educational services to the general public for at least two years immediately prior to consideration of the application by ACICS.
- (c) Its mission shall be to offer educational programs which help students develop skills and competencies to enhance their careers.
- (d) Its residential enrollment and enrollment in each program shall be sufficient both to support coursework and learning experiences that, separately or in combination, constitute measurable and defined educational programs, and to enable ACICS to assess the educational effectiveness of those programs.
 - Institutions that are considered distance education institutions may be considered on a case-by-case basis provided they require a residential component.
- (e) It shall have a sufficient number of graduates from a majority of its programs to enable ACICS to assess the educational effectiveness of those programs. Programs offered at any credential level from which there are no graduates will be reviewed in accordance with Section 2-2-107.

..,

2-2-107. Expansion of Program Offerings to Higher Credential Level. It is the responsibility of the institution to secure approval from the Council of the intention to initiate a program at a higher credential level.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation.

OPTIONS

- 1. Vote to approve for publishing in the Memo to the Field
- 2. Vote to amend the policy and bring before the Council in April:
- 3. Recommend a different approach to policy issue as stated below:
- Remove from further consideration.

POLICY/Feb.2018/Minutes Page **17** of **20** February 20-21, 2018

MOVED: Commissioner Loveman moved to accept option 1 as proposed.

SECONDED: Commissioner Bennett moved to second the motion.

ACTION: Passed

ABSTENTION: N/A

G. Institution/Campus Closure - Revocation Date Accuracy

CONSIDERATION: Proposed

STAFF: Ms. Katie Morrison

ISSUE/OBJECTIVE:

Currently, the *Criteria* is not clear that an institution's grant of accreditation or a campus' inclusion in an institution's grant of accreditation will be revoked effective the last date of academic activity/instruction, not the final day of administrative operations (the date a campus finally closes its doors), since academic activity is required for accreditation. This correlates with the date that an institution reports to the Department of Education for Title IV purposes.

The *Criteria* also allows for accreditation of a summarily suspended institution to be revoked effective a date later than its actual closure, should the institution provide information (not a petition indicating that it has not closed) as to its actual closure date.

*Note for staff review: Please cross-reference Voluntary Withdrawal policy item to ensure collection of all revisions to 2-3-401.

CRITERIA

2-2-301. Closing of a Main Campus. An institution is required to notify ACICS as far in advance as possible when it plans to cease operation. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The institution's grant of accreditation will be revoked <u>effective its final date of academic activity</u> as of the effective date of closing.

When ACICS receives information from any source that an institution has ceased to operate, it shall immediately take steps to verify the information. If the Council believes that the institution, in fact, has ceased operations, the grant of accreditation is summarily suspended. Such action is authorized without prior notice or hearing and with immediate public notice.

The institution shall be notified of the summary suspension in writing at its address of record. Within 10 days after receipt of the suspension notice, the institution may petition ACICS for an expedited determination of whether such suspension should be withdrawn. If no petition is filed within 10 days, the suspension automatically shall become a revocation effective as of the date of notice of suspension. Alternatively, should the closed institution provide ACICS with information regarding its final date of academic activity, the suspension shall become a revocation effective as of the date provided by the institution.

2-2-302. Closing of a Nonmain Campus. An institution is required to notify ACICS as far in advance as possible when it plans to close a nonmain campus. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The nonmain campus will cease to be included in the institution's grant of accreditation effective its final date of academic activity as of the effective date of the closing.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
- (c) An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
- (e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

OPTIONS

- 1. Vote to approve for publishing in the Memo to the Field
- 2. Vote to amend the policy and bring before the Council in April:
- 3. Recommend a different approach to policy issue as stated below:
- 4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Loveman moved to accept option 1 as proposed.

SECONDED: Commissioner Bennett moved to second the motion.

ABSTENTION: N/A

VI. <u>LICENSURE</u>

Staff recommendation is to defer to the oversight agency and require an action plan along with any communication/documentation from the oversight agency on licensure or certification. Place institutions below 60% on reporting and request improvement plan, communications, mitigating circumstances, trends, and any additional contextual information.

MOTION: Direct staff to research other "spaces": Programmatic, international, etc. before

taking action on licensure.

MOVED: Loveman SECOND: Hobdy ACTION: Passed

VII. STRATEGIC PLANNING

STAFF: Michelle Edwards

DISCUSSION: ACICS is successful in litigation and/or ACICS receives recognition by the U.S. Department of Education (the Department)

Recruitment of new members:

- (a) "Reopening" of Initial Application Process
- (b) Revision/Review of the Initial Application Process, including eligibility criteria (1-2-100)
- (c) Consideration of Membership "focus" areas domestic or international

Reinstatement of previous members:

- (a) Members that withdrew with an open grant of accreditation
- (b) Members that withdrew at the time of grant expiration

Considerations:

- (a) Reduction of Sustaining Fees? Pro-rata?
- (b) Reduction of Application Fees?
- (c) Limited visits for reinstatement based on timelines
- (d) "Catch up" of annual requirements for schools requesting reinstatement? i.e. AFR, CAR, Sustaining Fees

DISCUSSION: ACICS is unsuccessful in litigation and/or ACICS does not receive recognition by the Department

ACICS receives a final staff report for the Department recommending denial

- (a) ACICS continues to NACIQI and takes its chances on a favorable recommendation
- (b) ACICS withdraws its application for recognition until the point in time we feel confident that we can assure compliance with all standards

ACICS continues to NACIQI and the application for initial recognition is denied by the Senior Department Official

(a) Does ACICS appeal to the Secretary?

Paths following denial of application:

- (1) Dissolution of the agency
 - a. Timeline

POLICY/Feb.2018/Minutes Page 20 of 20 February 20-21, 2018

- b. Distribution of assets
- (2) Regroup, correct deficiencies and apply again
 a. Timeline based on burn rate of current assets

ADJOURNMENT:

Chair Guinan moved to adjourn at 11:35 on Wednesday, February 21, 2018.

EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE AGENDA Monday, April 9, 2018 1:00 PM - 2:00 PM

Committee Members
Commissioner Adriene Hobdy, Chair
Commissioner Larry Leak
Commissioner Tibby Loveman
Commissioner Judee Timm

Staff Liaison Ms. Karly Zeigler

Mr. Andre McDuffie

OLD BUSINESS

Learning Site
 Zeigler

NEW BUSINESS

Systematic Review
 Zeigler

FUTURE AGENDA

TBD

The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.

EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE MINUTES

Monday, April 9, 2018 1:00 PM - 2:00 PM

Committee Members

Commissioner Adriene Hobdy, Chair Commissioner Larry Leak Commissioner Tibby Loveman Commissioner Judee Timm

Staff Liaison

Ms. Karly Zeigler Mr. Andre McDuffie

Other Attendees

Ms. LaToya Boyd

Ms. Perliter Walters-Gilliam

Ms. Shaniqua Smith

Ms. Katie Morrison

Ms. Linda Lundberg

Ms. Michelle Edwards

CALL TO ORDER: Commissioner Hobdy called the meeting to order at 1:03PM on April 9, 2018.

OLD BUSINESS

• Learning Site Zeigler

In 2016 ACICS implemented a new criterion, which requires all learning sites to be within a five mile radius of their main branch by December 2018. Currently there are 42 learning sites that are more than five miles from their oversight campus. ACICS will require these campuses to provide a rationale that would explain why their learning site is beyond the five mile requirement. This rationale should include documentation that explains provisions for access to student services, student satisfaction, academic oversight, who the site manager/staff and their responsibilities, and potentially a student survey.

NEW BUSINESS

Systematic Review – Additional Items

Zeigler

The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.

The EEE committee discussed that international schools should be measured on a different scale than ACICS domestic schools. Therefore, EEE would prefer for the subcommittee to determine the nuances that the international schools may face during their quest for accreditation. This subcommittee should go line by line in the criteria to determine the common nuances or issues that may affect international schools who going through the accreditation process.

Workshops Report

Walters-Gilliam

ACICS would like to host two workshops by the year-end via webinar that will focus on the Renewal of Accreditation process and the Initial Applicant process. Persons who have had many years of direct experience on the renewal process for their institution may be able to attend the renewal workshop remotely, while newer persons should come onsite to the DC office to attend said workshop.

FUTURE AGENDA

TBD

MEETING ADJOURNED: Commissioner Hobdy moved to adjourn at 1:39PM on April 9, 2018.

The mission of the Education Enhancement and Evaluation Committee (EEE) is to establish standards for educational quality that assist institutions in mission fulfillment, program planning, non-traditional instructional delivery activities, development and implementation, institutional evaluation activities, and successful learning outcomes.

Case Name: In the Matter of Accrediting Council for

Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent

Colleges and Schools

Exhibit No.: B-O-167

INCOMPLETE

You are a:

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 3:56:57 PM Last Modified: Tuesday, October 06, 2015 3:57:37 PM

Time Spent: 00:00:40 IP Address: 209.136.209.93

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

O/F

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

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Respondent ekipped this

DB

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

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07

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Page 3: Systematic Review Advisory Committee (SRAC)

1771

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:27 PM Last Modified: Tuesday, October 06, 2015 4:30:39 PM

Time Spent: 00:01:12 IP Address: 76.117.48.167

Page 1: Providing Feedback on Proposed Criteria

ha

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

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Respondent skipped this

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Page 3: Systematic Review Advisory Committee (SRAC)

1771

For what role would you like to make a nomination?

Respondent skipped this quanting

Data Analyst

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:18 PM Last Modified: Tuesday, October 06, 2015 4:31:06 PM

Time Spent: 00:01:47 IP Address: 63.232.58.13

Page 1: Providing Feedback on Proposed Criteria

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What is your name (First, Last)?

Other (please specify)

You are a:

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Page 2: Providing Feedback on Proposed Criteria

Accept as written

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06

Accept as written

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107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

BUI

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

DII

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

Q11

For what role would you like to make a nomination?

Faculty,

Please provide full name, contact email and phone number, and short explanation.

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:31:14 PM Last Modified: Tuesday, October 06, 2015 4:31:56 PM

Time Spent: 00:00:41 IP Address: 23.226.92.166

Page 1: Providing Feedback on Proposed Criteria

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What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Respondent skipped this question:

DB

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Respondent skipped this quantities

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Page 3: Systematic Review Advisory Committee (SRAC)

17/11

For what role would you like to make a nomination?

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Started: Tuesday, October 06, 2015 4:30:45 PM Last Modified: Tuesday, October 06, 2015 4:34:15 PM

Time Spent: 00:03:30 IP Address: 68.67.215.195

Page 1: Providing Feedback on Proposed Criteria

DR.

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

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For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:37 PM Last Modified: Tuesday, October 06, 2015 4:34:34 PM

Time Spent: 00:04:56 IP Address: 70.183.0.184

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

(0/)

Accept as written

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

06

Accept as written

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

BUI

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

DII

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

010

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resoundent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:30:42 PM Last Modified: Tuesday, October 06, 2015 4:34:37 PM

Time Spent: 00:03:54 IP Address: 73.171.75.125

Page 1: Providing Feedback on Proposed Criteria

Dis

What is your name (First, Last)?

122

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0.4

Accept as written

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05

Accept as written

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06

Accept as written

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107

Accept as written

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BUI

Accept as written

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DII

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.010

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:34:17 PM Last Modified: Tuesday, October 06, 2015 4:36:19 PM

Time Spent: 00:02:01 IP Address: 38.111.154.130

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the

Bassandard skipped this quasition

0.4

Accreditation Criteria.

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Respondent skipped this question

DB

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Respondent ekipped this

DB

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Flesponden skipped trie

07

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Respondent alapped this numerical

Dtl

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Bospoothatt akipped this quastion

DH

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Respondent skipped this quantities

Respondent aklpped this question

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Page 3: Systematic Review Advisory Committee (SRAC)

1271

For what role would you like to make a nomination?

Respondent skipped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:34:55 PM Last Modified: Tuesday, October 06, 2015 4:36:59 PM

Time Spent: 00:02:04 IP Address: 108.171.131.166

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Busing Mark Styant 1915 must file

10/1

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Emperated skipped the question DB

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Respondent ekipped this

DB

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Flespondent skipped the grantion

07

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Reymordens olippodishis numerior

Dtl

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Respondent akipped this question

DH

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Respondent stopped this

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clarified the standard to allow for these circumstances.

Respondent ekipped this transition

Page 3: Systematic Review Advisory Committee (SRAC)

1771

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:31:32 PM Last Modified: Tuesday, October 06, 2015 4:37:19 PM

Time Spent: 00:05:46 IP Address: 209.65.177.217

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Accept as written

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Accept as written

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00

Accept as written

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DA

Accept as written

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DR

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

[31]

Accept as written

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.010

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

Q71

For what role would you like to make a nomination?

Resoundent skipped this

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:11 PM Last Modified: Tuesday, October 06, 2015 4:38:11 PM

Time Spent: 00:09:00 IP Address: 209.234.25.72

Page 1: Providing Feedback on Proposed Criteria

41

What is your name (First, Last)?

campus administrator

You are a:

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Accept as written

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Accept as written

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06

Accept as written

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

DB

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

DII

Accept as written

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

1201

For what role would you like to make a nomination?

Resoundent skryped this quanting

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:36:56 PM Last Modified: Tuesday, October 06, 2015 4:38:25 PM

Time Spent: 00:01:29
IP Address: 216.49.219.2

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Explanation

Cannot respond for the link did not work nor did the audio.

0.4

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Explanation

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Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Explanation

Cannot respond because the link did not work nor did the audio.

OB

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Explanation

Cannot respond because the link did not work nor did the audio.

D.A

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Explanation

Cannot respond because the link did not work nor did the audio.

DR

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Respondent skipped this question

100

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Neurondoni oliquad this

Respondent ekipped this quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resnandent skipped this quantime

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:21 PM Tuesday, October 06, 2015 4:39:12 PM Last Modified:

Time Spent: 00:09:50 IP Address: 98.175.109.138

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

campus administrator

You are a:

D2

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Accept as written

Accept as written

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107

Accept as written

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DB

Accept as written

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DII

Accept as written

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1291

For what role would you like to make a nomination?

Resoundent skryped this quanting

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:41:30 PM Last Modified: Tuesday, October 06, 2015 4:42:27 PM

Time Spent: 00:00:57
IP Address: 66.42.224.220

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

02

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Accept as written

campus administrator

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/1

Accept as written

Accept as written

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07

Accept as written

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DR

Accept as written

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[31]

Accept as written

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1201

For what role would you like to make a nomination?

Resoundent skryped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:46:00 PM Last Modified: Tuesday, October 06, 2015 4:47:12 PM

Time Spent: 00:01:11 IP Address: 161.38.221.155

Page 1: Providing Feedback on Proposed Criteria

ine.

What is your name (First, Last)?

102

You are a:

Other (please specify)

National Dir. of Strategic Operations (former campus

administrator)

Page 2: Providing Feedback on Proposed Criteria

DC

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Rospondion skipped this gonetion

DA

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Simulation supposed the spansion DB

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Respondent skipped this

DB

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Flespondon shipped the

Q7

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

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Dtl

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Respondent akipped this question

DH

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Respondent skipped this quantities

Respondent ekipped this quastion

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resnandant skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:48:40 PM Last Modified: Tuesday, October 06, 2015 4:50:48 PM

Time Spent: 00:02:07 IP Address: 107.194.182.8

Page 1: Providing Feedback on Proposed Criteria

138

What is your name (First, Last)?

102

public evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

(0/2

Accept as written

Accept as written

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06

Accept as written

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107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

DB

Accept as written

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DII

Accept as written

.010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:33:05 PM Last Modified: Tuesday, October 06, 2015 4:52:20 PM

Time Spent: 00:19:15

IP Address: 65.126.207.230

Page 1: Providing Feedback on Proposed Criteria

ine

What is your name (First, Last)?

D2

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/1

Accept as written

Accept as written

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Accept as written

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107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

DR

Accept as written

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DII

Accept as written

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

D71

Faculty

For what role would you like to make a nomination?

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:52:54 PM Last Modified: Tuesday, October 06, 2015 4:53:08 PM

Time Spent: 00:00:13 IP Address: 50.200.119.110

Page 1: Providing Feedback on Proposed Criteria

41

Accreditation Criteria.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the

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DB

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Respondent oloppodation

Dtl

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DH

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Respondent stopped this

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Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

Resnandent skippeå this quantimi

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:55:17 PM Last Modified: Tuesday, October 06, 2015 4:56:59 PM

Time Spent: 00:01:41 IP Address: 73.185.43.156

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please Project Manager specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

0.4

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the

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measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Bassardent skipped this question DB

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Respondent ekipped this

DB

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Q7

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Respondent elopped this numerical

DI

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

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DH

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Respondent stopped this

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clarified the standard to allow for these circumstances.

Respondent «kilyped this gum time

Page 3: Systematic Review Advisory Committee (SRAC)

1001

For what role would you like to make a nomination?

Please provide full name, contact email and phone number, and short explanation. I kept being "excused" from the webinar. Very frustrating!

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:56:02 PM Last Modified: Tuesday, October 06, 2015 4:57:27 PM

Time Spent: 00:01:25 IP Address: 146.145.83.6

Page 1: Providing Feedback on Proposed Criteria

ing

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/1

Accept as written

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06

Accept as written

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107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

DR

Accept as written

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DII

Accept as written

.010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:54:20 PM Last Modified: Tuesday, October 06, 2015 4:57:37 PM

Time Spent: 00:03:17

IP Address: 173.165.105.237

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

0.4

Accept as written

Accept as written

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07

Accept as written

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DR

Accept as written

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DII

Accept as written

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resoundent skryped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:55:51 PM Last Modified: Tuesday, October 06, 2015 5:01:03 PM

Time Spent: 00:05:12 IP Address: 69.40.247.106

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

campus administrator

You are a:

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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Accept as written,

Explanation examples would be appreciated to help explain "student enrichment and career opportunities"

06

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Accept as written

O.A.

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Accept as written

DR

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Accept as written

100

Accept as written

Q10

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Accept as written,

Explanation samples would be appreciated

Page 3: Systematic Review Advisory Committee (SRAC)

1071

For what role would you like to make a nomination?

Please provide full name, contact email and phone number, and short explanation. none at this time

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 4:29:42 PM Last Modified: Tuesday, October 06, 2015 5:06:57 PM

Time Spent: 00:37:15 IP Address: 104.169.8.186

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/4

Accept as written

Accept as written

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06

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107

Accept as written

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DR

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DII

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1271

For what role would you like to make a nomination?

Faculty,

Please provide full name, contact email and phone number, and short explanation.

is a faculty member who is involved in the curriculum and academic quality of our school.

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:16:47 PM Last Modified: Tuesday, October 06, 2015 5:17:37 PM

Time Spent: 00:00:49
IP Address: 68.188.1.98

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

0.4

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Respondent skipped this

OB

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Dtl

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DH

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Respondent skipped this quantion

Respondent ekipped this munition

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Page 3: Systematic Review Advisory Committee (SRAC)

Q31

For what role would you like to make a nomination?

Resnandent skipped this quantimi

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:11:09 PM Last Modified: Tuesday, October 06, 2015 5:22:49 PM

Time Spent: 00:11:39
IP Address: 50.192.42.233

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

Other (please Director of Academic Affairs specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Modify (explanation required),

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

I suggest some form of notice no matter how small. Key officers may not be present on a day you decide to visit. It is also possible that other activities with the communities around may have been planned.

Explanation

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

06

Accept as written

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107

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

BUI

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

DU

Accept as written

010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:29:09 PM Last Modified: Tuesday, October 06, 2015 5:38:31 PM

Time Spent: 00:09:22 IP Address: 50.0.102.154

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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Bassandard skipped Hills musikin

10/4

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Basperdent skipped the question DB

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Respondent skipped this

DB

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Respondent skipped this quantities

Respondent ekipped this quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

1231

For what role would you like to make a nomination?

Resnandent skipped this gometine

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:41:36 PM Last Modified: Tuesday, October 06, 2015 5:46:32 PM

Time Spent: 00:04:55 IP Address: 192.41.96.212

Page 1: Providing Feedback on Proposed Criteria

,DR

What is your name (First, Last)?

132

You are a:

Page 2: Providing Feedback on Proposed Criteria

ris

Accept as written

campus administrator

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YVA

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Explanation

Perhaps identify specifically whether the "credit hours" are "semester" or "quarter" credit hours.

JJ8

Accept as written

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100

Accept as written

.010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:42:54 PM Last Modified: Tuesday, October 06, 2015 5:50:46 PM

Time Spent: 00:07:51 IP Address: 168.39.166.1

Page 1: Providing Feedback on Proposed Criteria

DR CONTRACTOR OF THE CONTRACTO

What is your name (First, Last)?

Other (please State agency specify) staff

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Accept as written,

Explanation
Please continue to look at reasonableness of the teaching load.

Q7

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 5:14:47 PM Last Modified: Tuesday, October 06, 2015 5:52:38 PM

Time Spent: 00:37:50 IP Address: 38.111.154.130

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

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0/1

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107

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DII

Accept as written

010

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Page 3: Systematic Review Advisory Committee (SRAC)

Student
For what role would you like to make a nomination?

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 6:13:37 PM Last Modified: Tuesday, October 06, 2015 6:15:32 PM

Time Spent: 00:01:54 IP Address: 24.124.35.230

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

n's

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 6:13:46 PM Last Modified: Tuesday, October 06, 2015 6:25:58 PM

Time Spent: 00:12:11

IP Address: 207.38.121.252

Page 1: Providing Feedback on Proposed Criteria

Dri

DH

What is your name (First, Last)?

Other (please specify)

You are a: Sr. Director, Accreditation & Licensing

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Regresinient oktowed this question

010

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 6:41:35 PM Last Modified: Tuesday, October 06, 2015 6:44:16 PM

Time Spent: 00:02:40 IP Address: 216.2.128.122

Page 1: Providing Feedback on Proposed Criteria

, Ęń

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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0/1

Accept as written

05

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Page 3: Systematic Review Advisory Committee (SRAC)

1371

For what role would you like to make a nomination?

Resoundent skryped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 6:36:59 PM Last Modified: Tuesday, October 06, 2015 6:46:37 PM

Time Spent: 00:09:37 IP Address: 100.36.192.11

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Modify (explanation needed)

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0/1

Modify (explanation required)

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010

Modify (explanation needed)

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Page 3: Systematic Review Advisory Committee (SRAC)

1201

For what role would you like to make a nomination?

Faculty,

Please provide full name, contact email and phone number, and short explanation.

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 8:10:35 PM Last Modified: Tuesday, October 06, 2015 8:11:13 PM

Time Spent: 00:00:37 IP Address: 69.3.118.163

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

You are a:

102

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

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the primary role of verifying reported institutional data.

Bassandard skipped till s gusslinn

Evaluator

Other (please

specify)

Basperdent skipped the question DB

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Respondent skipped this

DB

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,Q7

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Dtl

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Bongarothert akipped thin quantiles

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Respondent slapped this

Respondent ekipped this quantine

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Page 3: Systematic Review Advisory Committee (SRAC)

Q31

For what role would you like to make a nomination?

Respondent skipped this quanting

Collector: Web Link 1 (Web Link)

Started: Tuesday, October 06, 2015 9:24:19 PM Last Modified: Tuesday, October 06, 2015 9:28:32 PM

Time Spent: 00:04:13

IP Address: 104.137.118.215

Page 1: Providing Feedback on Proposed Criteria

Milest in very near a (Singt Leat)?

What is your name (First, Last)?

Other (please ACICS evaluator specify)

You are a:

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Accept as written

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06

Accept as written

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107

Accept as written

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DR

Accept as written

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DII

Accept as written

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010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 3:29:46 AM Last Modified: Wednesday, October 07, 2015 3:38:48 AM

Time Spent: 00:09:01 IP Address: 77.28.249.208

Page 1: Providing Feedback on Proposed Criteria

Lin.

What is your name (First, Last)?

campus administrator

You are a:

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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07

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BUI

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Page 3: Systematic Review Advisory Committee (SRAC)

Q11

For what role would you like to make a nomination?

Employer,

Please provide full name, contact email and phone number, and short explanation.

Director of Financial Aid

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 7:46:57 AM Last Modified: Wednesday, October 07, 2015 7:47:33 AM

Time Spent: 00:00:36 IP Address: 209.234.25.72

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Busington skipped tills quastion

Other (please specify)

Remondent skipped the question DB

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Respondent ekipped this

DB

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Flespondent skipped trik aumbon

,Q7

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Reynanders olipped this numerics

DI

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Bospoothart akipped this quastion

DH

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Respondent skipped this quanties

Respondent ekipped this quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

131

For what role would you like to make a nomination?

Resnandent skipped this gometine

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 7:55:57 AM Last Modified: Wednesday, October 07, 2015 7:59:11 AM

Time Spent: 00:03:14 IP Address: 66.186.163.112

Page 1: Providing Feedback on Proposed Criteria

ing

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Dis.

04

Accept as written

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107

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.010

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Page 3: Systematic Review Advisory Committee (SRAC)

1291

For what role would you like to make a nomination?

Resoundent skipped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 8:01:28 AM Last Modified: Wednesday, October 07, 2015 8:02:06 AM

Time Spent: 00:00:37 IP Address: 50.200.119.110

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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Bassandord skipped Hills musiking

0/1

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Besperdent skipped the question DB

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Respondent skipped this

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Flespondent skipped the grantion

307

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Respondent elapportable

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Bespondent skipped this question

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Respondent elapped this

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 8:11:30 AM Last Modified: Wednesday, October 07, 2015 8:14:07 AM

Time Spent: 00:02:37 IP Address: 50.75.255.107

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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107

Accept as written

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DR

Respondent elegand this question

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Pall

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Page 3: Systematic Review Advisory Committee (SRAC)

1201

For what role would you like to make a nomination?

Resoundent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 8:19:43 AM Last Modified: Wednesday, October 07, 2015 8:26:05 AM

Time Spent: 00:06:22 IP Address: 174.140.83.52

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

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10/1

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Modify (explanation needed),

Explanation Community Resources need to be better defined.

06

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Accept as written

Q7

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Accept as written

178

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Accept as written

150

Accept as written

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Modify (explanation needed),

Explanation

Need to see the definition of student satisfaction before accepting as written.

Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent slapped this

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 8:51:32 AM Last Modified: Wednesday, October 07, 2015 8:51:48 AM

Time Spent: 00:00:16 IP Address: 173.163.0.201

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

ris.

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0/4

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Respondent skipped this question

DB

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Respondent skipped this

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Flespondent skipped the grantion

307

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Respondent elapportable

Dtl

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Bospondian akipped this quastion

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Respondent stopped this

Respondent eldppetixhis quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

Resnandant skipped this quantiles

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 8:52:12 AM Last Modified: Wednesday, October 07, 2015 8:53:49 AM

Time Spent: 00:01:36 IP Address: 173.13.62.26

Page 1: Providing Feedback on Proposed Criteria

Dis

What is your name (First, Last)?

132

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

04

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BUI

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010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resoundent skipped this quanting

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 9:08:21 AM Last Modified: Wednesday, October 07, 2015 9:08:36 AM

Time Spent: 00:00:15 IP Address: 216.24.89.14

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

campus administrator

You are a:

Accreditation Criteria.

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter I of the

Respondent skipped the question:

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gualian

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Respondent ekipped this

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Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 9:27:39 AM Last Modified: Wednesday, October 07, 2015 10:11:17 AM

Time Spent: 00:43:37
IP Address: 50.248.25.225

Page 1: Providing Feedback on Proposed Criteria

,Di

What is your name (First, Last)?

102

Other (please specify)

Student Services Director

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Accept as written

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Reject (explanation required),

Explanation

Unannounced visits are detrimental to the integrity of the institution and ACICS as a whole. ACICS should give an institution a 24-hour notice prior to their arrival. What can be gained in 24-hours is something to the institution's pride. The difference between surprising an institution and announcing in advance only 24-hours will show both the institution of the serious of the visit and would not look as if ACICS is only out to kind any little offence to justify their existence. Compliance is a way to ensure that procedures are being followed. An unannounced visit demonstrates little faith in the institution's ability to perform let alone comply. I can only assume that the US Department of Education also performs unannounced visits to all accrediting bodies in the same manner as to seek if they are in compliance.

Modify (explanation needed),

Explanation

Does the Council has special insight to regional community resources as to prescribe exceptions to the variety of activities performed by a particular institution. In South Florida the Import Export industry accounts for over 20% of all businesses. Since Import Export is regional in nature how can ACICS or for that matter any other accrediting body justify that this field is not in high demand as that of a Medical Assistant, or Administrative Assistant, or of a Front Desk Manager in a Hotel. The institution should be allowed some latitude in the community resources they have at their disposition. This includes language and diversity.

Accept as written

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

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Page 3: Systematic Review Advisory Committee (SRAC)

Modify (explanation needed),

Explanation

Because of the large amount of foreigners in the US that have received a college degree elsewhere. A third-party should evaluate the credentials of these individuals to ensure they have the same amount of preparation as US instructor teaching a given course. An instructor having a Masters in Health Management from a university in Argentina should be able to teach a course in Macroeconomics if they have taken 9 hours of Economics during their undergraduate studies.

Accept as written

Accept as written

For what role would you like to make a nomination?

Faculty,

Please provide full name, contact email and phone number, and short explanation.

Bachelors of Science in Technical Management / Regis University, Denver, CO / December 1986 Masters in Business Administration / St. Thomas University, Miami, FL / December 1991 Doctor in Business Administration / Humboldt International University, Miami, FL / Estimate Graduation December 2016. Part-Time: Student Service Director @ New Professions Technical Institute (NPTI), Miami, FL Part-Time: Director of Administration @ Humboldt International University, Miami, FL Retired Military, Chief Instructor for Import & Export Program at NPTI since 1996. Over 20 years in the International Business industry.

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 10:40:24 AM Last Modified: Wednesday, October 07, 2015 10:42:01 AM

Time Spent: 00:01:37 IP Address: 12.226.190.250

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please

You are a: Campus administrator AND faculty member

specify)

Page 2: Providing Feedback on Proposed Criteria

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124

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Respondent Skipped Well

DB

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Respondent ekipped this

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307

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Respondent stopped this

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantim

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 10:26:42 AM Last Modified: Wednesday, October 07, 2015 10:46:21 AM

Time Spent: 00:19:38
IP Address: 98.236.23.171

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please compliance specify)

You are a:

0.4

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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D7

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Modify (explanation needed),

Explanation

Couldn't this Criteria apply to other general education courses rather than just limiting it to applied. For example, in SC in a diploma program there is a requirement to have general education courses included within the program. Typically these are standard general education courses and are not applied general education. Wouldn't it be more applicable if this said both applied general education and general education? At the occupational associate's degree Criteria for both are included (3-3-202 a, b).

CIE

Accept as written

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DB

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010

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Page 3: Systematic Review Advisory Committee (SRAC)

5017

For what role would you like to make a nomination?

Respondent obsport the pursion

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 11:01:54 AM Last Modified: Wednesday, October 07, 2015 11:14:49 AM

Time Spent: 00:12:54 IP Address: 50.205.185.10

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

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INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 11:26:11 AM Last Modified: Wednesday, October 07, 2015 11:31:23 AM

Time Spent: 00:05:12 IP Address: 66.118.69.99

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

Corporate Administrator

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 1:12:20 PM Last Modified: Wednesday, October 07, 2015 1:13:01 PM

Time Spent: 00:00:40 IP Address: 74.223.40.178

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

Other (please specify)

You are a:

Accreditation Criteria.

Page 2: Providing Feedback on Proposed Criteria

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

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Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 2:38:36 PM Last Modified: Wednesday, October 07, 2015 2:39:02 PM

Time Spent: 00:00:25 IP Address: 66.152.102.186

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

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Busing that skipped this question

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Respondent ekipped this munition

Page 3: Systematic Review Advisory Committee (SRAC)

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1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 4:25:41 PM Last Modified: Wednesday, October 07, 2015 4:27:36 PM

Time Spent: 00:01:54 IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

Ds .

What is your name (First, Last)?

Other (please Placement specify) officer

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

0.4

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the

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Respondent ekipped this

DB

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Respondent skipped trill dumbon

,Q7

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Respondent elopped this numerical

Dtl

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Bospoodsatt akipped this quastion

JŲĽ

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Resnandant skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 4:42:22 PM Last Modified: Wednesday, October 07, 2015 4:42:51 PM

Time Spent: 00:00:28 IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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0/1

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

Suspendent skipped the question DB

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Respondent ekipped this

DB

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Flespondent skipped the grantion

,Q7

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Dtl

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Bonganthan akipped this quastion

DH

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Respondent skipped this quantities

Respondent ekipped this quantion

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Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

Respondent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 5:00:16 PM Last Modified: Wednesday, October 07, 2015 5:21:48 PM

Time Spent: 00:21:31

IP Address: 209.173.38.130

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG.

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/1

Modify (explanation required),

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Explanation

Unannounced visits are understandable, but the monetary cost to the institution needs to be considered as it could be an unnecessary financial burden placed on the institution. The current language "to host" denotes that the institution will be charged for the visit: Staff, Travel, Hotel and Meals, with no prior knowledge and/or control over the expenditure.

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

06

Accept as written

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107

Accept as written

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DR

Accept as written

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DII

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

1291

For what role would you like to make a nomination?

Resoundent skipped this gunstion

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, October 08, 2015 9:20:01 AM Thursday, October 08, 2015 9:20:21 AM Last Modified:

Time Spent: 00:00:20 IP Address: 12.226.190.250

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

faculty member D2

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from

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Baspordent skipped this 0/4

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DB

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Respondent skipped this

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Respondent slapped this numerion

DI

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DH

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Respondent stopped this

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specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Respondent ekipped this must less

Page 3: Systematic Review Advisory Committee (SRAC)

Q31

For what role would you like to make a nomination?

Resnandent skipped this gometine

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, October 08, 2015 11:00:16 AM Last Modified: Thursday, October 08, 2015 11:02:53 AM

Time Spent: 00:02:37 IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please Placement Director

specify)

gualian

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accreditation Criteria.

04

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the

Respondent skipped this

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DB

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Respondent ekipped this

DB

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Flespondon shipped the

07

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Respondent alapped this numerical

Dtl

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Bospondian akipped this quastion

DH

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Respondent skipped this quantities

Respondent ekipped this quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

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COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, October 08, 2015 2:27:32 PM Last Modified: Thursday, October 08, 2015 2:30:45 PM

Time Spent: 00:03:12 IP Address: 68.62.121.222

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

130

You are a:

Page 2: Providing Feedback on Proposed Criteria

pis.

Accept as written

public evaluator

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0/1

Accept as written

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Accept as written

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107

Accept as written

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DB

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Page 3: Systematic Review Advisory Committee (SRAC)

Q91

For what role would you like to make a nomination?

Resoundent skryped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, October 08, 2015 10:52:18 PM Last Modified: Thursday, October 08, 2015 11:14:53 PM

Time Spent: 00:22:35
IP Address: 99.117.173.208

Page 1: Providing Feedback on Proposed Criteria

Dist

What is your name (First, Last)?

102

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

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Accept as written

Accept as written

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107

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Accept as written

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100

Modify (explanation needed),

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Explanation

Include measurements and explanations that describe ill-prepared students.

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this quanting

Collector: Web Link 1 (Web Link)

Started: Wednesday, October 07, 2015 4:28:55 PM Last Modified: Friday, October 09, 2015 10:12:09 AM

Time Spent: Over a day IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

DR Responsent skipped this

What is your name (First, Last)?

Q2 Respondent elapped this

You are a:

Page 2: Providing Feedback on Proposed Criteria

Pira Bondondani aktinani Mira

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Requirement skipped the quarties

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Respondent akhped this

OB

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Flespondon shipped the

,Q7

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Respondent elopped this numerical

Dtl

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Respondent akipped this question

DH

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Respondent skipped this quantities .010

Respondent dayped this guestion

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Page 3: Systematic Review Advisory Committee (SRAC)

Employer

For what role would you like to make a nomination?

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, October 09, 2015 1:20:17 PM Last Modified: Friday, October 09, 2015 1:20:43 PM

Time Spent: 00:00:26 IP Address: 63.135.255.96

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

Bassachter Shipper Hills

0.4

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Basparalent skipped this question

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Respondent ekipped this

DB

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,Q7

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Respondent slapped this numerical

Dtl

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Bonganthan akipped this quastion

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Respondent stopped this

D10

Respondent ekipped this quastion

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Page 3: Systematic Review Advisory Committee (SRAC)

Q31

For what role would you like to make a nomination?

Respondent skipped this number

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 12:54:51 PM Last Modified: Tuesday, April 19, 2016 12:55:08 PM

Time Spent: 00:00:17
IP Address: 74.213.12.146

Page 1: Providing Feedback on Proposed Criteria

,Ęñ

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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0.4

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Respondent skipped this question

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Respondent skipped tids quastion

DB

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Q7

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Respondent alapped this numerical

Dtl

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Romanithers akipped this quantiles

DH

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Respondent skipped this quantities 010

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Rospondent ekipped this gransting

Page 3: Systematic Review Advisory Committee (SRAC)

1211

For what role would you like to make a nomination?

Resnandent skipped this quastion

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:03:49 PM Last Modified: Tuesday, April 19, 2016 1:12:45 PM

Time Spent: 00:08:56 IP Address: 74.133.31.170

Page 1: Providing Feedback on Proposed Criteria

,QI

What is your name (First, Last)?

102

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

04

Accept as written,

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Explanation

In the current climate of national media attention as well as attention from state and federal agencies I agree it is prudent to add this function to the accreditation visits. As an evaluator I look forward to seeing institutions that are providing a valuable service separated from the few that are not. It will affirm ACICS's commitment to holding wrongdoers accountable rather than allowing all institutions to be painted with the same brush.

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

OB

Accept as written

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DA

Accept as written

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108

Accept as written,

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Explanation

Having been involved in several discussions about the criteria for placement, I see the wisdom in this plain, succinct definition. I believe it is exactly as it should be.

09

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

Q71

For what role would you like to make a nomination?

Respondent skipped this governor

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:14:28 PM Last Modified: Tuesday, April 19, 2016 1:14:52 PM

Time Spent: 00:00:23 IP Address: 184.183.149.99

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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0.4

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Respondent skipped that question

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Respondent skipped this question

DB

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Respondent skipped trill

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Dtl

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Bonganthan akipped this quastion

DH

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Respondent stapped this powerlon

D10

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clarified the standard to allow for these circumstances.

Respondent ekipped this granting

Page 3: Systematic Review Advisory Committee (SRAC)

1211

For what role would you like to make a nomination?

Resnondent skipped this question

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:16:15 PM Last Modified: Tuesday, April 19, 2016 1:16:50 PM

Time Spent: 00:00:34 IP Address: 161.38.221.112

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

02

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Basicantial skipped tills quastion

0.4

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Respondent skipped this goestion

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Respondent skipped this question

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.07

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Respondent alapped this numerica

Dtl

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DH

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Respondent skipped this quantities D10

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specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Respondent ekipped this granting

Page 3: Systematic Review Advisory Committee (SRAC)

1211

For what role would you like to make a nomination?

Resnandent skipped this quastion

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:03:52 PM Last Modified: Tuesday, April 19, 2016 1:19:09 PM

Time Spent: 00:15:16 IP Address: 38.111.154.130

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Accept as written

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Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Modify (explanation needed),

Explanation

I know that ACICS does not want to get into the business in verifying individual state reporting requirements, which include public postings. Consequently, I think some language needs to be included that explains that the required ACICS documentation excludes individual state reporting requirements.

Accept as written

Modify (explanation needed),

Explanation

For those institutions that offer degree programs where most of their students are on F-1 VISAS or are from foreign countries, the graduates return to their home countries and are often never heard from again. Because of the economic situation in their home countries they may be underemployed based on their degree. Since a lot of this section is in response to repayment of student financial aid which foreign students do not receive, I suggest that this section be bifurcated into foreign and domestic placement definitions.

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of

Accept as written

mino

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Accept as written,

Explanation

This is fine as written. Compliance is another issue since it leaves open the possibility of course manipulation that will allow a student to achieve this standard by getting credit for taking these courses in an abbreviated fashion. For example, paying for 3-units and only having to do a research project whereas other bachelor degree students would be required to spend 45+ hours in class.

Page 3: Systematic Review Advisory Committee (SRAC)

that debarment following the appeal.

CYCL

For what role would you like to make a nomination?

Employer,

Please provide full name, contact email and phone number, and short explanation.

I believe I have already been considered for a similar role by ACICS concerning doctoral programs, but I am happy to help in any way I ca. Mike Guerra, Ed.D.

Dean of Faculty and Associate Professor of Business

Administration Lincoln University mguerra@lincolnuca.edu 1-510-628-8031 also Atherton Chief of Police (ret)

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 12:51:11 PM Last Modified: Tuesday, April 19, 2016 1:24:05 PM

Time Spent: 00:32:53 IP Address: 161.38.1.246

Page 1: Providing Feedback on Proposed Criteria

Di .

What is your name (First, Last)?

Other (please accreditation administrator specify)

You are a:

04

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Accept as written

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Accept as written

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06

Accept as written

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107

Modify (explanation needed),

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Explanation and licensure exam pass rates, if applicable.

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Pall

Accept as written

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010

Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)

Q71

For what role would you like to make a nomination?

Resoundent skryped this gumahni

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:33:37 PM Last Modified: Tuesday, April 19, 2016 1:50:47 PM

Time Spent: 00:17:10 IP Address: 73.131.36.248

Page 1: Providing Feedback on Proposed Criteria

Dis .

What is your name (First, Last)?

Other (please specify)

Evaluator/Site Visit Chair

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Modify (explanation required),

Explanation

The proposed mechanism for monitoring or evaluating this standard, i.e. having a member of the site visit team do this evaluation is unclear. Is this individual a new team member, or does this responsibility lie with a current member such as the SR or Chair position? What guidelines will be established to review this data? Not sure this type of review is feasible beyond what is already being done. For example calls are made to verify placement but the system is already flawed by the process and not sure how this would change or whether it would move to a separate evaluator. Need more explanation of exactly how this would work, which other reviews would be moved to the new evaluator. Would there be sufficient time to train individuals on how to approach the implementation and evaluation of the new standard at the campus level prior to July 1?

Accept as written

Accept as written

07

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.



Modify (explanation needed),

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

This definition is too broad and seems to imply only 2 levels of placement. Does working in the field of study encompass related fields? I think an example of "directly benefits" the graduate's employment should be included. For example I have seen where there is the "possibility" of advancement in the future based on the new credential. Does that

count?

Explanation



Accept as written

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Page 3: Systematic Review Advisory Committee (SRAC)



Respondent skipped this grantion

For what role would you like to make a nomination?

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 2:14:29 PM Last Modified: Tuesday, April 19, 2016 2:14:51 PM

Time Spent: 00:00:22

IP Address: 206.201.163.132

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

public evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Accreditation Criteria.

04

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Respondent skipped this question

DB

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Respondent alapped this numerica

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DH

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Respondent skipped this quantities D10

Rospondent eklyped xhis question

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Page 3: Systematic Review Advisory Committee (SRAC)

1211

For what role would you like to make a nomination?

Resnandant skipped this quastion

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 1:46:18 PM Last Modified: Tuesday, April 19, 2016 2:47:14 PM

Time Spent: 01:00:55

IP Address: 65.189.253.106

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Modify (explanation needed),

Explanation

public evaluator

Regarding this language: "Definition of Academic Quality ACICS defines academic quality as the overall performance of the institution in the context of its mission and as measured by the extent to which the institution achieves its intended student learning and student success outcomes." While I support the idea that institutions have (and should have) varying missions, and different ideas about what constitutes student learning and success outcomes, there are many generally accepted standards in education, some dictated by the accreditation standards and others by Federal or State laws and regulations. Just because an institution states its mission and learning outcomes, and achieves them, does not mean they have "academic quality." If we only measure academic quality by the extent to which an institution achieves their goals, and their goals are ill advised, or illegal we do a disservice to students and other stakeholders. In other words, I think this should go on to add "and its adherence to generally accepted and legally mandated principles of education."



Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Modify (explanation required),

Explanation

I would suggest that this is not a "new standard" because there has always been an expectation of data integrity; truthfulness, etc. I do believe that not meeting the standard for data integrity should be defined up front as a "non-compliant action" so that probation may be imposed if necessary.

0.5

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Accept as written

.06

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127

Accept as written

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Dill

Accept as written

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Accept as written

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Respondent shipport Ura guestion

Dire

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Page 3: Systematic Review Advisory Committee (SRAC)

5017

For what role would you like to make a nomination?

Respondent obspection pursion

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 2:45:15 PM Last Modified: Tuesday, April 19, 2016 2:49:36 PM

Time Spent: 00:04:21 IP Address: 184.4.126.15

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

132

You are a:

Other (please specify)

Retired professor consultant

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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107

Accept as written

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DR

Accept as written

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DII

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Resoundent skipped this governor

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 4:29:50 PM Last Modified: Tuesday, April 19, 2016 4:30:15 PM

Time Spent: 00:00:24 IP Address: 12.109.126.170

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

122

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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Respondent skipped this question

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Respondent skipped trill

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Respondent skipped this quanties

Respondent skipped this question

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Page 3: Systematic Review Advisory Committee (SRAC)

1231

For what role would you like to make a nomination?

Respondent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, April 20, 2016 12:10:58 PM Last Modified: Wednesday, April 20, 2016 12:24:36 PM

Time Spent: 00:13:37
IP Address: 108.178.228.54

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Accept as written

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Modify (explanation needed),

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Explanation

The instruction is to vague. What does Council mean by "documented process"? How is a school to document that admission personnel communicated current and accurate information to satisfy Council's directive?

Accept as written

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

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Page 3: Systematic Review Advisory Committee (SRAC)

071

For what role would you like to make a nomination?

Respondent skipped this governor

Collector: Web Link 1 (Web Link)

Started: Wednesday, April 20, 2016 4:03:36 PM Last Modified: Wednesday, April 20, 2016 4:04:01 PM

Time Spent: 00:00:24 IP Address: 50.130.231.32

Page 1: Providing Feedback on Proposed Criteria

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What is your name (First, Last)?

Other (please Past commissioner specify)

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Page 2: Providing Feedback on Proposed Criteria

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Respondent stopped this

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Thursday, April 21, 2016 3:26:44 PM Last Modified: Thursday, April 21, 2016 3:26:57 PM

Time Spent: 00:00:12 IP Address: 96.10.1.34

Page 1: Providing Feedback on Proposed Criteria

he

What is your name (First, Last)?

Q2

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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Respondent skipped that quantion

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Respondent skipped this question

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Respondent skipped this quantities

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Respondent skipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Thursday, April 21, 2016 3:28:22 PM Last Modified: Thursday, April 21, 2016 3:28:35 PM

Time Spent: 00:00:13 IP Address: 41.140.176.53

Page 1: Providing Feedback on Proposed Criteria

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What is your name (First, Last)?

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You are a:

Page 2: Providing Feedback on Proposed Criteria

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campus administrator

Respondent skipped this goestion

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Respondent skipped trill

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DI

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Thursday, April 21, 2016 3:29:28 PM Last Modified: Thursday, April 21, 2016 3:29:38 PM

Time Spent: 00:00:10 IP Address: 63.139.2.122

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Respondent skipped this question

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quanting

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, April 21, 2016 3:43:02 PM Last Modified: Thursday, April 21, 2016 3:52:25 PM

Time Spent: 00:09:23 IP Address: 99.42.88.23

Page 1: Providing Feedback on Proposed Criteria

001

What is your name (First, Last)?

102

public evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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04

Modify (explanation required),

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Explanation

One recommendation would be to more clearly define the exact role of the Team member who is chosen to handle this new task, and how the size of the campus would determine if they are to do just (solely) this or other duties as well. For example would this person also handle their regular duties (report/s) as i.e., Ed Act, Library, etc.

DS

Accept as written

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DB

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

DII

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Q10

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Please provide full name, contact email and phone number, and short explanation.
N/A

Collector: Web Link 1 (Web Link)

Started: Friday, April 22, 2016 3:06:01 PM Last Modified: Friday, April 22, 2016 3:06:23 PM

Time Spent: 00:00:21 IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

he

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

ris.

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Baseson to the skipper (1905)

0.4

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Respondent skipped this question

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action
Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Rosportism skipped tida quantion

DB

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Flespondon shipped the

07

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Respondent alapped this numerical

Dtl

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Bongarothers akipped thin quantiles

DH

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Respondent skipped this quantities

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has

clarified the standard to allow for these circumstances.

Respondent ekipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

1231

For what role would you like to make a nomination?

Respondent skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Monday, April 25, 2016 5:55:02 PM Last Modified: Monday, April 25, 2016 5:55:16 PM

Time Spent: 00:00:13 IP Address: 208.87.107.66

Page 1: Providing Feedback on Proposed Criteria

Dit

What is your name (First, Last)?

student

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the

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0.4

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Bassandord skipped tills quasifon

Respondent skipped this question

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Respondent skipped this question

DB

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Flespondent skipped the grantion

07

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Reymordens olippodishis-

Dtl

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Bospondian akipped this quastion

DH

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Respondent skipped this quanties D10

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clarified the standard to allow for these circumstances.

Respondent skipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, April 19, 2016 3:52:50 PM Last Modified: Wednesday, April 27, 2016 12:40:46 PM

Time Spent: Over a day IP Address: 38.96.35.122

Page 1: Providing Feedback on Proposed Criteria

Ds

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Reject as written (explanation needed)

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

0.4

Accept as written

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DE

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.



Accept as written

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.



Modify (explanation needed),

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Explanation

I think that the disclosure statement that is being added needs to be reworded in such a way that it not only protects ACICS but does not invalidate the integrity of the institution.

DR

Modify (explanation needed),

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Explanation

Working in the field of study (or related field) or acquiring a credential that directly benefits the graduate's existing employment. (Reason: Many of our court/deposition graduates who have passed the CSR examination are choosing to be employed as CART providers for the deaf and hard-of-hearing community.).

D3

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

070

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

.010

For what role would you like to make a nomination?

Employer,

Please provide full name, contact email and phone number, and short explanation.

He is a business person whose wife and sisterin-law have graduated from our college and have passed the State examination. He hires our graduates, provides mentoring for new reporters, and is involved in the Irvine Chamber of Commerce. He is totally supportive of for-profit schools.

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2016 3:15:36 PM Last Modified: Thursday, April 28, 2016 3:15:51 PM

Time Spent: 00:00:15 IP Address: 12.159.255.194

Page 1: Providing Feedback on Proposed Criteria

ine

What is your name (First, Last)?

D2

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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04

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Respondent skipped this question

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Respondent skipped this question

DE

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Filespondent skipped the qualifor

307

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Respondent oloppodation

Dtl

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Bonganthan akipped this quastion

DH

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Respondent skipped this quantities

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clarified the standard to allow for these circumstances.

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2016 3:16:31 PM Last Modified: Thursday, April 28, 2016 3:16:43 PM

Time Spent: 00:00:11

IP Address: 50.250.166.193

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

02

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

Businest days skipperd Man

campus administrator

0.4

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Respondent skipped this question

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Rospontism skipped tids quantion

OB

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Flespondon shipped the

,Q7

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Respondent slapped this numerica.

CNU

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Bospoothart akipped this quastion

DH

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Respondent skipped this quanties student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often

specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

010

Admissions Requirements for Professional Master's Degree
Programs: The Council proposes to clarify language
related to the admissions requirements for professional
master's degree programs which lead to certification or
licensure following graduation. Currently, the Council
requires that, if an institution admits a student into a
master's degree without a baccalaureate degree, the

Respondent ekipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

not required for a professional master's degree by

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2016 3:16:26 PM Last Modified: Thursday, April 28, 2016 3:18:30 PM

Time Spent: 00:02:04 IP Address: 65.112.119.137

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

You are a:

Other (please Administration and faculty specify)

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

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Respondent skipped this question

DB

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Respondent skipped trill

,Q7

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

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Dtl

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Bonganthan akipped this quastion

DH

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Respondent stopped this

010

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clarified the standard to allow for these circumstances.

Respondent ekipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

D31

For what role would you like to make a nomination?

Resnandent skipped this quantilini

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2016 3:18:36 PM Last Modified: Thursday, April 28, 2016 3:19:23 PM

Time Spent: 00:00:47 IP Address: 65.189.253.106

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

Other (please evaluator specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined
that it was important to provide a clear definition of

that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

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Respondent skipped this question

DB

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Respondent skipped trill

307

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Respondent alapped this purerion

DI

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DH

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Respondent skipped this quanties 010

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specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, April 28, 2016 5:24:01 PM Last Modified: Thursday, April 28, 2016 5:24:44 PM

Time Spent: 00:00:43 IP Address: 71.180.176.196

Page 1: Providing Feedback on Proposed Criteria

Dis

What is your name (First, Last)?

Other (please specify)

You are a: Director, Career Services Department

Page 2: Providing Feedback on Proposed Criteria

133

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Resymmtoni okuppad this musedou

04

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Respondent skinped from question

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Respondent skipped this question

OB

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Respondent skipped trill

Q7

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Respondent alapped this punction

Dil

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

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DH

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Respondent stopped this

010

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often

specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Respondent skipped this must los

Page 3: Systematic Review Advisory Committee (SRAC)

1231

For what role would you like to make a nomination?

not required for a professional master's degree by

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, April 29, 2016 10:32:07 AM Last Modified: Friday, April 29, 2016 10:32:43 AM

Time Spent: 00:00:35 IP Address: 67.139.31.1

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

14%

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

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Respondent skipped this question

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Respondent skipped this question

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307

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Respondent skipped this quantities D10

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Page 3: Systematic Review Advisory Committee (SRAC)

1231

For what role would you like to make a nomination?

Respondent skipped this quantiles

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, April 29, 2016 5:02:48 PM Last Modified: Friday, April 29, 2016 5:02:58 PM

Time Spent: 00:00:09
IP Address: 12.18.245.220

Page 1: Providing Feedback on Proposed Criteria

test

What is your name (First, Last)?

public evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

G. Bondonstany as upont Ui question

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Respondent skipped this quantities 010

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Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

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Collector: Web Link 1 (Web Link)

Started: Monday, May 02, 2016 4:17:37 PM Last Modified: Monday, May 02, 2016 4:23:43 PM

Time Spent: 00:06:05 IP Address: 67.78.186.66

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

172

You are a: Owner and VP of Academic Affairs

Page 2: Providing Feedback on Proposed Criteria

133

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Other (please specify)

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Respondent skipped this question

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Modify (explanation needed),

Explanation

Several weeks ago I discussed with issue that I had with the description of "Placed upon required use of skills". It was actually brought to my attention by our legal counsel as a result of the many Attoneys' Generals lawsuits over disclosures, particularly with regard to placement. said that the Council was going to revisit the issue and come up with a definition of placement. While I see that they did do that, it did not resolve the issues that I brought to her attention with regard to this particular category. While I understand the concept of placed by skills and I concur it is a valid and necessary category, the language used to describe it exposes the colleges to array of legal problems. Specifically, the second sentence is the problem and here's why: 1. "These skills must be listed in the institution's published program description" • There is no ACICS definition of "program description". The

criteria mentions program OBJECTIVE, but this is different from program description. What specifically is meant by program description. When you leave something open to interpretation, it is playground for the lawyers. . The skills learned in any program are voluminous. Each course in each program could have anywhere from 5-10-15 "skills". There would be no way to list all of these skills, even in a program description, 2, "A majority of these skills must be documented in the employer's job description" . When you use the word "majority" that has a very specific LEGAL definition, one more than half. Did we really want to put the schools in a position of proving that in a particular job a graduate is using more than 50% of the skills learned in the program. I know this sounds silly to you and me, but this language opens attorneys up to this very interpretation and the schools would have to defend it. . These skills must be documented in the employer's job description. So, now the institution must keep a copy of the job description and it must list those skills. First, I've seen very few job description written like that. Second, this standard requires A job description. Many small local businesses (particularly in WV where I operate) don't have formal job descriptions and if they do, they certainly are not going to have the detail of a skills listing. Again, you are boxing the schools in when it really isn't necessary. This language exposes the institution to a multitude of attacks from attorneys due to the language as written. When I talked with I suggested that the second sentence be removed all together and the first sentence be modified to read something like "....placed based upon the use of the core skills contained in the area of concentration in the student's program". The criteria already defines "area of concentration" which are the core skills to which was referring and which was the intent of the language. We also don't need to get into a "numbers game" with the words "majority" and "predominate". If you require the job to include the skills in the core area of concentration then everyone knows what those are because you have to list them when you develop your curriculum in your new and revised program applications. As a former commissioner (and an attorney myself), I understand the delicate balance in trying to use language to explain a concept. In this case, the institutions have been unnecessarily placed in a situation of having to defend very specific language which is not necessary, in my opinion, to protect the integrity of the standard. I am respectfully requesting the Council revisit this language and modify it.

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

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Page 3: Systematic Review Advisory Committee (SRAC)

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For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Monday, April 25, 2016 4:09:00 PM Last Modified: Wednesday, May 04, 2016 9:48:34 AM

Time Spent: Over a week IP Address: 98.85.96.77

Page 1: Providing Feedback on Proposed Criteria

ha

What is your name (First, Last)?

Q2

You are a:

Other (please specify)

President and CEO,

Page 2: Providing Feedback on Proposed Criteria

103

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Modify (explanation needed),

Explanation

We respectfully request the Council to delay implementation of the proposed Recruitment Activities Review until January 2017. The proposed effective date of July 1, 2016 provides institutions with insufficient time to properly document that "any person" (i.e., every person) engaged in admissions or recruitment practices is communicating current and accurate information regarding courses and programs, student achievement disclosures, services, tuition, terms, and operating policies, as well as documentation of review and oversight measures of their admissions and recruitment personnel. To properly implement this, institutions need ample time to develop documents that cover each of these six areas and demonstrate each and every admissions or recruitment representative has received proper training as well as evidence of subsequent review and oversight measures. In large, multi-campus institutions such as ours, this affects many, many personnel and will require extensive time to create, document, and implement for each admissions and recruitment representative. In addition, we request that ACICS issue the planned recruitment activities best practices guide in advance of the effective date of the proposed Recruitment Activities Review. As stated in the Memorandum to the Field, the Council intends to conduct research and survey institutions on their practices and will then issue a best practices guide. We very much look forward to a best practices guide on this topic so we may enhance our procedures and also to ensure compliance with this new comprehensive documentation requirement. We thank the Council in advance for planning to create such a valuable resource to its member institutions. If institutions create documents and processes surrounding use of those documents prior to the issuance of the best practices guide, they are less likely to implement this effectively or in accordance with best practices. Also, once institutions establish documents and related processes, they are reluctant to revise them soon thereafter. Therefore, if the best practices guide is issued after the effective date of this change, institutions may have additional hurdles to revise their relatively new documents and related implementation processes. Conversely, the opportunity to build documents and processes to implement use of such documents based on ACICS's best practices guide will provide institutions with direction and a solid foundation, which in turn, will meet both the language and spirit of this new requirement.

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

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We request that ACICS publish on its website an official definition of the retention rate and the licensure exam pass rate well in advance of the effective date of the Institutional Performance Disclosure, July 1, 2016. Currently, ACICS provides an official definition of placement at http://www.acics.org/accreditation/content.aspx? id=6425. This has been an excellent resource for institutions, particularly as an accurate and complete explanation of the ACICS placement rates that the U.S. Department of Education requires institutions to publish in Gainful Employment Disclosures. The U.S. Department of Education has found some institutions to have inaccurately or insufficiently explained their student outcomes definitions and calculations, resulting in allegations of misrepresentation. This is a poor reflection on both those institutions and on their accrediting agencies. In some cases, these instances may have been unintentional. If ACICS provides clear and official definitions of retention and licensure exam pass rates (similar to the ACICS definition of placement), institutions can reference those definitions in this new Institutional Performance Disclosure requirement. Without such definitions, there could be allegations of misrepresentation, given some institutions may unintentionally not disclose or insufficiently disclose a definition of retention or licensure exam pass rates. With such definitions, institutions may confidently provide complete and accurate definitions in addition to the actual rates. Prospective and current students, the public, and other regulatory agencies will be better equipped to understand the rates and make decisions based upon them. Additionally, institutions and ACICS will be better able to demonstrate to the U.S. Department of Education et, al, that we are committed to complete and accurate disclosure.

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Page 3: Systematic Review Advisory Committee (SRAC)

J.H

For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Wednesday, May 04, 2016 10:02:46 AM Last Modified: Wednesday, May 04, 2016 10:05:09 AM

Time Spent: 00:02:23 IP Address: 209.65.177.217

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

You are a:

President and Chief Executive Officer,

Page 2: Providing Feedback on Proposed Criteria

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Page 3: Systematic Review Advisory Committee (SRAC)

J.H.

For what role would you like to make a nomination?

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Collector: Web Link 1 (Web Link)

Started: Wednesday, May 04, 2016 12:29:41 PM

Last Modified: Friday, May 06, 2016 9:13:14 AM

Time Spent: Over a day IP Address: 161.38.1.246

Page 1: Providing Feedback on Proposed Criteria

Dis

What is your name (First, Last)?

102

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

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10/4

Accept as written

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Accept as written

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Modify (explanation needed),

Explanation

We recommend that standard be modified to explicitly state which rates must be disclosed. The standard as written states that the rates must be at the campus level but does not state if the rates to be disclosed are the overall campus rates, the rates by program, or both. The inclusion of licensure pass rates implies that the disclosures are to be at the program level, but the standard is not clear. In addition, we recommend that for licensure exam pass rates, the standard explicitly state that it is for those programs that are required to report the pass rates to ACICS, i.e. those where licensure/certification are required for employment. In addition on a related note, we recommend that the Council review the policy and formula it uses for calculating licensure pass rates. This formula has changed several times over the last few years and the directions provided for last year's CAR post some concerns. First, the rate campuses were to provide was a three year average of pass rate percentages which can cause skewed results vs. using raw data. Secondly, there was no way to differentiate or provide additional notes for those programs that did not yet have three years of pass rates. We were instructed to use the averages of the years that we did have, whether that was one, two or three years. Again this creates concerns about the consistency in the rates being reported. Finally, for many of these programs we are also required by separate programmatic accreditors to calculate and disclose pass rates. In most instances the cohort periods, timeframes, and calculation differ from that used in the ACICS calculation. This raises concerns about having various; conflicting pass rates disclosed which may confuse prospective students.

Modify (explanation needed),

Explanation

Council staff has explained that this revision is not intended to alter the current interpretation of placement, however as written it appears that it does which may cause confusion for campuses and evaluators. Specifically the proposed definition does not appear to account for the placement category of "Skills Match" but only accounts for those that are CIP to SOC direct title matches or by benefit placements. We recommend that the definition be altered to account for those skills match placements.

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Accept as written

Admissions

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

SOTT

For what role would you like to make a nomination?

Respondent stapped the purstion

You are a:

Collector: Web Link 1 (Web Link)

Started: Wednesday, April 27, 2016 9:11:32 PM Last Modified: Friday, May 06, 2016 1:32:56 PM

Time Spent: Over a week IP Address: 12.130.117.99

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

Member of the public specify)

Page 2: Providing Feedback on Proposed Criteria

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

Modify (explanation needed),

Explanation

To qualify for federal recognition, an accrediting agency must demonstrate that its accredited institutions have degree and certificate requirements that "at least conform to commonly accepted standards." Many accreditors implement this by ensuring that colleges conduct reviews of every program, and that the reviews include outside parties. For example, under a NEASC standard, institutions must have a regular cycle of reviews of academic programs that "includes evidence of student success and program effectiveness and incorporates an external perspective." The accreditor role is to, essentially, audit the school's processes to make sure that the reviews are happening, and that the external reviewers are appropriate experts and truly independent. Some accreditors check to ensure that the external reviewers are examining the actual work that students do: the papers, tests, and presentations that are graded and revised as part of the learning process. I have found no evidence that ACICS expects this type of quality assurance from its schools, nor that ACICS audits the rigor and independence of the processes. Further, adding the proposed definition of academic quality does not repair the problem. Indeed, the components in the definition are wholly inadequate: course grades are internal and therefore not reliable; retention rates can be a sign of an engaging program, but they can also be a sign of low standards (a diploma mill, after all, has a graduation rate of 100 percent); placement rates are notoriously unreliable: they are difficult to monitor and easy to game (see question # 6); satisfaction surveys administered by a college are not a reliable measure of academic quality (as research has shown, students can be happy w/o learning: ignorance is bliss).

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Modify (explanation required),

Explanation

From the documentation I have seen of ACICS campus reviews, the agency needs to dramatically increase the resources it puts toward analyzing institutions' data and assertions. The visiting team reports I have reviewed have reported that as few has five or six phone calls are made to employers to verify employment claims. The process appears haphazard and unreliable. Furthermore, an examination should not be limited to checking data that a school submits to ACICS as part of the accreditation process. For example, for years Wright Career College has been submitting reports to the IRS -- which are public and easily available -- that raise questions about the institution's integrity. In checking Wright management's claims to being a nonprofit, ACICS should have reviewed those documents.

Modify (explanation needed),

Explanation

Probation may be a reasonable addition, but most important is to have standards that are meaningful and a review process that is effective in identifying problems -- and also encouraging excellence, not just "compliance."

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Modify (explanation needed),

Explanation

The current criterion starts well, with the admonition that "Recruiting shall be ethical." But the rest of the section on recruitment activities, including the proposed edits, is focused not on ethically recruiting students, but instead on lowlevel legal compliance, and documenting that "disclosures" and "information" were provided. In terms of student understanding, the disclosure documents are much less important than the personal interaction between the prospective student and the school representative. Yet the narrow ACICS focus on disclosure documents means that college recruiters can be unethical as long as the evidence is not in the "documentation." The huge distance that ACICS needs to travel on this issue is evident from part (d) of this standard, which declares that "recruitment and enrollment personnel may not be designated as counselors or advisors." The visiting team checklist (question 4.15) monitors this requirement by asking, "Are the titles of recruitment and enrollment personnel appropriate?" The job title is not the problem! School representative should not be in all-out "selling" mode regardless of their titles. This demonstrates a wrongheaded obsession with technical compliance while actual ethical treatment of students -- is ignored. To give schools an incentive to be more ethical in providing information to potential students, ACICS should launch a shopper program to experience what happens to real prospects. Schools should be called on anything that is sleazy (ethics), not just on outright lies (compliance). The test of ethical recruiting is not what is in the written disclosures, but the timing and content of what is communicated, and emphasized, whether in writing, verbally or emotionally.

Reject (explanation needed),

Explanation

The proposed disclaimer is inappropriate for a school to post. The school should stand by its data, offering whatever truthful caveats that are appropriate. The disclaimer refers to verification by ACICS, which is a different matter. As proposed, the disclaimer seems to be a way for schools to escape responsibility for their own data.

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

Modify (explanation needed),

Explanation

The proposed definition's inclusion of students' current jobs demonstrates the difficulty in using strict placement rates as an accountability measure. Placement rates are plagued by the judgment calls about "in the field" and how much of a "benefit" is enough to count. A more reliable measure of whether a program has value to an employer is the employer's participation in supporting students in the training programs. ACICS should adopt a new standard that measures the extent to which each program is financed by sources other than federal and state grant and loan programs. The measure would serve as a market indicator of value.

Modify (explanation needed),

Explanation

Part 2 of the Memorandum to the Field describes changes in ACICS bylaws to create a method "by which it reconciles conflicts of interest or perceived breaches of integrity." It calls for a three-person committee, of which two are public members, to opine on ethics questions. ACICS needs to make much more significant changes in its governance in order to be a trusted and ethical accreditor. The Memorandum's proposal is based on a narrow interpretation of a conflict of interest: the situation in which a college owner influences specific decisions about his or her own institution. The real problem, however, is that the entire accreditation enterprise is a conflict of interest: owners of institutions control the entity that determines the standards and processes by which institutions are judged. When serving as the gatekeeper for federal aid it becomes a mutual enrichment society not a quality assurance mechanism. For ACICS to have independence and integrity, the Board of Directors should be composed entirely of people without a financial interest in an institution accredited by the agency. Everyone should voluntarily resign and ask the Secretary of Education to appoint a new board. (I realize this is not item 7, but there was no item on the questionnaire for this topic).

D10

Rospondent eldpartitils quastion

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

1331

For what role would you like to make a nomination?

Respondent skipped this quantiles

Collector: Web Link 1 (Web Link)

Started: Friday, May 06, 2016 1:45:59 PM Last Modified: Friday, May 06, 2016 1:55:11 PM

Time Spent: 00:09:11 IP Address: 12.18.245.220

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

1/2

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter 1 of the Accreditation Criteria.

0/

Accept as written

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

Modify (explanation needed),

Explanation

Comment 1. We suggest that ACICS include the words "of accreditation" to clarify 2-3-241. The suggested edits are listed in all caps below. 2-3-241. Imposition. Probation may be imposed by the Council either following a show-cause directive, or after an institution has notified the Council that it intends to appeal a denial OF ACCREDITATION or withdrawal OF ACCREDITATION action. Comment 2. We suggest that ACICS change the word "reasons" to "areas of noncompliance" in 2-3-243 to be consistent with your new wording used in 2-3-240. The suggested edit is listed in all caps below, 2-3-243. Probation Lifted. When the AREAS OF NONCOMPLIANCE for the probation have been satisfied, the probation may be lifted by ACICS (See Title II, Chapter 3, Introduction). The Council may order a special visit at the institution's expense before lifting probation. The Council may order a special visit at the institution's expense before lifting probation

Modify (explanation needed),

Explanation

Comment 1. We suggest that ACICS clarify what is meant by Student Achievement disclosures in 3-1-412(a)? Are you specifically referring to the ACICS CAR data? Section 3-1-412(a): An institution shall have a documented process to ensure that any person or entity engaged in admissions or recruitment activities on its behalf is communicating current and accurate information regarding courses and programs, student achievement disclosures, services, tuition, terms, and operating policies.

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Modify (explanation needed),

Explanation

Comment 1. We suggest revisions to the Performance Information Disclosure. The suggested edits are listed below in all caps. Performance Information Disclosure "The student achievement rates for retention, placement, and/or licensure examination disclosed above are provided for information purposes only. They are based on data submitted ANNUALLY to ACICS in fulfillment of CAMPUS accountability REPORTING requirements but have not been 100% verified or tested for complete accuracy BY ACICS. Students should give the information appropriate weight in making an enrollment decision." Comment 2. ACICS should be aware that institutions will need to include in the new ACICS Institutional Performance Disclosure the specific ACICS calculations for retention, placement and graduation. Therefore, if ACICS changes any of their calculation methods, it is imperative member institutions be notified so the Institutional Performance disclosure can be updated. It is important that institutions include these calculation formulas in their disclosures because many institutions are often required to report other rates for this same data (retention, placement, graduation, licensure pass rate) as required by Federal Agencies, State Agencies, Programmatic Accreditors, Boards of Nursing, etc. These agencies have their own required calculation formulas for this data. Including the calculation formulas helps to inform the public on how the rates were calculated. ACICS may want to consider providing exact language on what institutions should list on their disclosure as the calculation formulas for retention, placement, graduation rate and licensure pass rates. Comment 3. We suggest that the Final CAR Reports generated through the ACICS CAR system be updated for the next CAR reporting period to include the new disclosure language (once approved) as many institutions will be uploading these reports as their evidence of compliance. Posting the ACICS Final CAR Reports on the school website was a best practice recommended on the recent ACICS webinar.

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

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Page 3: Systematic Review Advisory Committee (SRAC)

For what role would you like to make a nomination?

Modify (explanation needed),

Explanation

Comment 1. We suggest that the ACICS change the word "individual(s)" to "person(s) or entity" to be consistent with your wording used throughout 2-3-900. The suggested edit is listed in all caps below. A debarment order may be issued by the Council as a result of its consideration of the facts presented. The Council's decision will be sent to the PERSON(S) OR ENTITY by electronic and certified mail following their challenge appeal before the Council.

Accept as written

Employer,

Please provide full name, contact email and phone number, and short explanation.

submitted several student and employer candidates to previously. If you need any of this information resubmitted, please contact

Collector: Web Link 1 (Web Link)

Started: Friday, May 06, 2016 3:07:28 PM Last Modified: Friday, May 06, 2016 3:10:43 PM

Time Spent: 00:03:15 IP Address: 108.253.56.58

Page 1: Providing Feedback on Proposed Criteria

, Dir.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Definition of Academic Quality: The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

0.4

Accept as written

Data Integrity Standard: The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

DS

Accept as written

Probation Standards: The Council proposes to include the "Probation" action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

Dil

Accept as written

Recruitment Activities Review: The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

107

Modify (explanation needed).

Institutional Performance Disclosures: The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

Explanation

We have campus(s) that have very small populations. If we are posting placement results for groups smaller than 10, these students/graduates are easily identifiable, which could seem to violate some privacy laws.

DB

Accept as written

Placement Definition: The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

100

Accept as written

Debarment Policy: The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

010

Accept as written

Admissions Requirements for Professional Master's Degree Programs: The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

Page 3: Systematic Review Advisory Committee (SRAC)

Q71

For what role would you like to make a nomination?

Resoundent skipped this quanting

Collector: Web Link 1 (Web Link)

Started: Friday, May 20, 2016 2:26:00 PM Last Modified: Friday, May 20, 2016 5:57:18 PM

Time Spent: 03:31:17

IP Address: 107.135.125.153

Page 1: Providing Feedback on Proposed Criteria

700

What is your name (First, Last)?

102

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Respondent skipped tills marsline

Page 3: Systematic Review Advisory Committee (SRAC)

ΩA

For what role would you like to make a nomination?

Respondent skipped this, question

Collector: Web Link 1 (Web Link)

Started: Saturday, May 21, 2016 12:40:09 AM Last Modified: Saturday, May 21, 2016 12:41:02 AM

Time Spent: 00:00:53 IP Address: 24.100.160.127

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

Administrative Staff Member

You are a:

DA

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Respondent skipped this

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

For what role would you like to make a nomination?

Remonsion skipped this musting

Collector: Web Link 1 (Web Link)

Started: Tuesday, May 24, 2016 9:23:34 AM Last Modified: Tuesday, May 24, 2016 9:28:45 AM

Time Spent: 00:05:10 IP Address: 209.65.177.216

Page 1: Providing Feedback on Proposed Criteria

135

What is your name (First, Last)?

355

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Di3

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

QA

Employer

Collector: Web Link 1 (Web Link)

Started: Wednesday, May 25, 2016 3:32:34 PM Last Modified: Wednesday, May 25, 2016 3:35:29 PM

Time Spent: 00:02:54 IP Address: 69.80.66.210

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

172

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Modify (explanation needed),

Explanation

The Council proposes to clarify its current Council action procedures to note that the Council WILL take an appropriate non-compliant action IMMEDIATELY. This will include the "Probation" action. Prohation WILL be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. THE COUNCILE WILL PERMIT AN INSTITUTION TO REMAIN ON PROBATION FOR 3 MONTHS.

Page 3: Systematic Review Advisory Committee (SRAC)

04

Respondent stapped the quarties

Collector: Web Link 1 (Web Link)

Started: Thursday, May 26, 2016 12:31:34 PM Last Modified: Thursday, May 26, 2016 12:32:51 PM

Time Spent: 00:01:16

IP Address: 173.226.21.220

Page 1: Providing Feedback on Proposed Criteria

100

What is your name (First, Last)?

102

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Dia.

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

ŮΝ

Respondent skipped this contribut

Collector: Web Link 1 (Web Link)

Started: Thursday, May 26, 2016 2:44:21 PM Last Modified: Thursday, May 26, 2016 2:48:10 PM

Time Spent: 00:03:48
IP Address: 173.226.21.220

Page 1: Providing Feedback on Proposed Criteria

bs

What is your name (First, Last)?

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Dis.

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

DA

Faculty

Collector: Web Link 1 (Web Link)

Started: Thursday, June 02, 2016 1:15:38 PM Last Modified: Thursday, June 02, 2016 1:39:06 PM

Time Spent: 00:23:28
IP Address: 67.17.174.30

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

102

You are a:

Other (please

specify)

General Manager of West Virginia Business College

Page 2: Providing Feedback on Proposed Criteria

103

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

Qa

For what role would you like to make a nomination?

Faculty,

Please provide full name, contact email and phone number, and short explanation.

Collector: Web Link 1 (Web Link)

Started: Friday, June 03, 2016 1:26:42 PM Last Modified: Friday, June 03, 2016 1:27:06 PM

Time Spent: 00:00:24 IP Address: 209.136.209.93

Page 1: Providing Feedback on Proposed Criteria

test

What is your name (First, Last)?

Administrative Staff Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time.

This will include the "Probation" action. Probation may be appropriate the institution has materially demonstrated.

ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II,

Chapter 3, Introduction.

DA

Rassamlani shippart Urs quasilan

Page 3: Systematic Review Advisory Committee (SRAC)

For what role would you like to make a nomination?

Responsent exappoint his numerion

Collector: Web Link 1 (Web Link)

Started: Monday, June 06, 2016 5:43:03 PM Last Modified: Monday, June 06, 2016 5:43:54 PM

Time Spent: 00:00:50 IP Address: 73.223.56.234

Page 1: Providing Feedback on Proposed Criteria

700

What is your name (First, Last)?

102

Faculty Member

You are a:

Page 2: Providing Feedback on Proposed Criteria

pa

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Besponding skipped tills mussion

Page 3: Systematic Review Advisory Committee (SRAC)

DA

For what role would you like to make a nomination?

Remainment skipped this question

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 08, 2016 3:00:08 AM Last Modified: Wednesday, June 08, 2016 3:00:32 AM

Time Spent: 00:00:24 IP Address: 173.65.199.67

Page 1: Providing Feedback on Proposed Criteria

DR

Resonnsent skipped this

What is your name (First, Last)?

Employer

You are a:

102

Page 2: Providing Feedback on Proposed Criteria

Ŋ3

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Respondent his part this

Page 3: Systematic Review Advisory Committee (SRAC)

DA

For what role would you like to make a nomination?

Reseasant engineering

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 22, 2016 9:04:46 AM Last Modified: Wednesday, June 22, 2016 9:05:44 AM

Time Spent: 00:00:58
IP Address: 63.235.142.180

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

Student

You are a:

Page 2: Providing Feedback on Proposed Criteria

pig.

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

DA

Graduate

Collector: Web Link 1 (Web Link)

Started: Friday, July 01, 2016 10:00:16 AM Last Modified: Friday, July 01, 2016 10:01:12 AM

Time Spent: 00:00:55 IP Address: 12.18.245.220

Page 1: Providing Feedback on Proposed Criteria

TEST

What is your name (First, Last)?

Public Evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

DA Student,

For what role would you like to make a nomination? Please provide full name, contact email and phone number, and short explanation.

number, and short explanation.

Collector: Web Link 1 (Web Link)

Started: Friday, July 01, 2016 11:23:28 AM Last Modified: Friday, July 01, 2016 11:31:55 AM

Time Spent: 00:08:26 IP Address: 12.18.245.220

Page 1: Providing Feedback on Proposed Criteria

4.

What is your name (First, Last)?

122

You are a:

Other (please specify)

ACICS School Group

Page 2: Providing Feedback on Proposed Criteria

Sylvan.

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Modify (explanation needed),

Explanation

It is recommended that you provide additional clarification in 2-3-241 related to providing written notice of probation status. The Council will be provide in writing and will: a. State fully the reasons why the Council issued the Probation Status; b. Identify the Criteria and/or other accreditation requirement with which the school may not be in compliance; c. Explain the reasons and cite the evidence indicating that the school may not be materially operating in accordance with accreditation requirements; and d. Advise the school of its obligations and the deadline for response.

Page 3: Systematic Review Advisory Committee (SRAC)

Die

For what role would you like to make a nomination?

Graduate,

Please provide full name, contact email and phone number, and short explanation. We previously provided several graduate and employer candidates to ACICS.

Collector: Web Link 1 (Web Link)

Started: Thursday, July 07, 2016 1:01:53 PM Last Modified: Thursday, July 07, 2016 1:02:57 PM

Time Spent: 00:01:04

IP Address: 209.136.209.93

Page 1: Providing Feedback on Proposed Criteria

.00

What is your name (First, Last)?

Other (please Coordinator specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Probation Standards: The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate non-compliant action at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

Page 3: Systematic Review Advisory Committee (SRAC)

Respondent skipped this question

Collector: Web Link 2 (Web Link)

Started: Friday, September 16, 2016 4:51:04 PM Last Modified: Friday, September 16, 2016 4:51:41 PM

Time Spent: 00:00:37 IP Address: 173.75.255.200

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

02

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Bassardad skipped tills gæstinn DA

Campus Effectiveness Plan - Appendix K: The Council has proposed a series of revisions to the Campus Effectiveness Plan (CEP). The changes include the addition of "Appendix K," which will detail the guidelines and requirements for the CEP, including all evaluation elements and monitoring processes. In addition, the Council proposes adding two more important new measurements, namely, the programand campus-level graduation rate, and the institutional cohort default rate.

Respondent akipped tids quantion

TIR

Campus Accountability Procedures and Guidelines -Appendix L: The Council proposes to include all of the standards related to student achievement and the Campus Accountability Report (CAR) in "Appendix L" of the Accreditation Criteria. The new Appendix includes the current student achievement rates and the applicable monitoring statuses and actions for campuses and programs that are not meeting acceptable student achievement indicators. In the proposed language, the Council more clearly defines the point at which a particular action will be taken, including the issuance of an adverse action, a probation order, a compliance warning, or reporting and restrictions against a campus or program. The Council also proposes revising language in corresponding sections of the Criteria, such as student achievement review and Council actions at the programlevel.

Respondent aktoped Man governor

DU

Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

Respondent skipped this quitalon

D7

Basic Records: The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

Bengantien skipped this unserior D8

Library, Instructional Resources, and Technology: The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.

Respondent skipped tids question

DE

Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level. Resemble to a special this punition

010

Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

Respondent skipped this question

JON!

Admissions, Transfer Credit, and Catalog Disclosures: The Council proposes to revise a number of items related to the admissions, transfer of credits, and disclosure requirements in this area. Institutions must ensure that foreign transcripts of international students are validated for their equivalency to U.S. requirements for the purposes of admissions or transfer of credit. In addition, institutions may only accept transfer credits from accredited institutions that are recognized by the U.S. Department of Education or by their respective governments.

Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

Respondent slapped this named on

0119

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Residential support the

013

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this question

DITA-

Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

Respondent hilpped this guardina

Collector: Web Link 2 (Web Link)

Started: Friday, September 16, 2016 4:52:31 PM Last Modified: Friday, September 16, 2016 4:55:05 PM

Time Spent: 00:02:33 IP Address: 41.223.139.114

Page 1: Providing Feedback on Proposed Criteria

Dri .

What is your name (First, Last)?

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Accept as written

Campus Effectiveness Plan - Appendix K: The Council has proposed a series of revisions to the Campus Effectiveness Plan (CEP). The changes include the addition of "Appendix K," which will detail the guidelines and requirements for the CEP, including all evaluation elements and monitoring processes. In addition, the Council proposes adding two more important new measurements, namely, the programand campus-level graduation rate, and the institutional cohort default rate.

Accept as written

Campus Accountability Procedures and Guidelines -Appendix L: The Council proposes to include all of the standards related to student achievement and the Campus Accountability Report (CAR) in "Appendix L" of the Accreditation Criteria. The new Appendix includes the current student achievement rates and the applicable monitoring statuses and actions for campuses and programs that are not meeting acceptable student achievement indicators. In the proposed language, the Council more clearly defines the point at which a particular action will be taken, including the issuance of an adverse action, a probation order, a compliance warning, or reporting and restrictions against a campus or program. The Council also proposes revising language in corresponding sections of the Criteria, such as student achievement review and Council actions at the programlevel.

Accept as written

Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

Accept as written

Basic Records: The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

D8

Accept as written

Library, Instructional Resources, and Technology: The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.



Accept as written

Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level.

010

Accept as written

Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

1.11

Accept as written

Admissions, Transfer Credit, and Catalog Disclosures: The Council proposes to revise a number of items related to the admissions, transfer of credits, and disclosure requirements in this area. Institutions must ensure that foreign transcripts of international students are validated for their equivalency to U.S. requirements for the purposes of admissions or transfer of credit. In addition, institutions may only accept transfer credits from accredited institutions that are recognized by the U.S. Department of Education or by their respective governments.

Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

1500

Accept as written

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Accept as written

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

D14

Accept as written

Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

Collector: Web Link 2 (Web Link)

Started: Saturday, September 17, 2016 6:59:30 AM Last Modified: Saturday, September 17, 2016 7:04:04 AM

Time Spent: 00:04:33 IP Address: 96.250.42.101

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please ACICS evaluator specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Accept as written

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Accept as written

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D8

Accept as written

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Ų

Accept as written

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010

Accept as written

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Accept as written

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Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

1000

Accept as written

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

013

DT4

Accept as written

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Accept as written

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Monday, September 19, 2016 5:40:47 PM Last Modified: Monday, September 19, 2016 6:40:16 PM

Time Spent: 00:59:29
IP Address: 216.24.89.22

Page 1: Providing Feedback on Proposed Criteria

Dit.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

da .

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Bospon for skipped titls guestion DA

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Respondent skipped tills quastion

TIF

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Respondent aktioned their nordbox

D0

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Respondent skipped this quitalon

D7

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Bengandan skipped thes umesters



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Respondent skipped this question



Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level. Modify (explanation needed),

Explanation

I wish to comment on the Defined term from section 3-2-102 as well as other similar yet inconsistent definitions and terms used causing me confusion as I strive to be compliant and follow ACICS guidelines. Terms "Preparation" 3-2-102 & 3-2-102 and 3-3-301 "Assignments" 3-2-104 and 3-3-302 "Teaching Load" 3-2-101 and 3-3-303 Where the term Teaching Load is consistent in addressing the same general topic, when we study the Preparation and Assignments sections, these seem to mean different things, that is Preparations is a specific count of courses and subjects for the non degree programs, where as Assignments gives these same specifics for the Occupational degree programs. Furthermore, is this implying three fields and 5 subjects in each thus a possible 15 subject preps in a term? Since in your example you use all business related classes. Maintaining qualified faculty is a struggle for small schools. Faculty want full time status as employees. If I am limited to 5 subjects, I face losing faculty. The definition of teaching loads being "Reasonable" can mean many things and perhaps it is better to limit the number of Fields, which I would agree with three, but reasonable latitude for an instructor restricted to one Field of study to have more than five subject Preps.

Q110

Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

Respondent skipped fluis guestion DAI

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Respondent skipped tids

012

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Raypondont skippind this

QTO

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Raypondont (kipped tiple ausetion

Q14-

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Resignation akipped this question

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Wednesday, September 21, 2016 10:48:31 PM Last Modified: Wednesday, September 21, 2016 10:48:49 PM

Time Spent: 00:00:18
IP Address: 98.236.205.41

Page 1: Providing Feedback on Proposed Criteria

ря

What is your name (First, Last)?

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

DO

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Businet Mills Skipped Wills

DA

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Respondent skipped tids quantion

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Pes combat skipped bles poredline

DU

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Respondent skipped thisquistion

D7.

Basic Records: The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

Bengandan skipped this unneries D8

Library, Instructional Resources, and Technology: The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.

Respondent skipped tills question

DE

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010

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Respondent skipped this question

2011

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Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

Respondent slapped this named on

0.12

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Responsibility skipped the question 013

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this question

DITA-

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Respondent his part this guestion

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Thursday, September 22, 2016 4:10:48 PM Last Modified: Thursday, September 22, 2016 4:11:39 PM

Time Spent: 00:00:50 IP Address: 192.103.84.92

Page 1: Providing Feedback on Proposed Criteria

DR Responsent skipped this

What is your name (First, Last)?

public evaluator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Council Action/Probation Standard: The Council proposes

to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

DA

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Respondent akipped tids quantion

TIE

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Pestorobat akhpad Mira porehior

DU

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Respondent slapped this quitalor

D7.

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Bengantini skipped this umerior D/S

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Respondent skipped ties question

OF

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010

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Respondent skipped this question

JON!

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Respondent slapped this named on

Q12

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Resident skipped the question 013

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this

DITA-

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Respondent hillpard this quarties

COMPLETE

Collector: Web Link 2 (Web Link)

Started: Friday, September 23, 2016 4:24:00 PM Last Modified: Friday, September 23, 2016 4:26:11 PM

Time Spent: 00:02:11 IP Address: 71.94.20.85

Page 1: Providing Feedback on Proposed Criteria

Di

What is your name (First, Last)?

02

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

103

Accept as written

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Accept as written

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Modify (explanation needed),

Explanation

I would suggest when campuses submit data that we submit not only by program but CIP code. As you know, many of our schools reviewed their programs for compliance with GE over the last 2 years and updated CIP codes, however, kept the same name of the program. Now those programs are implemented with the same name as something that is being taught out, the data will become muddled and not a true picture of either program.

Accept as written

Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

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Accept as written

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D8

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Accept as written

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010

Accept as written

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1.11

Accept as written

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rhio

Accept as written

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Accept as written

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Accept as written

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Friday, October 14, 2016 11:22:12 AM Last Modified: Friday, October 14, 2016 11:29:15 AM

Time Spent: 00:07:03 IP Address: 99.101.42.108

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

.....

You are a:

Other (please specify)

Consultant, past Chairman of the

Council

Page 2: Providing Feedback on Proposed Criteria

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Accept as written

Accept as written

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Modify (explanation needed),

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Explanation
While I agree with the changes, schools should be notified in advance of potential adverse actions and have sufficient time to prepare for the changes. This is a retroactive action that is unfair to the schools. This should go into effect for the 2016/2017 CAR, not the 2015/2016 CAR.

Accept as written

Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

Modify (explanation needed),

Explanation

The Council should clearly state that this is effective as of a date certain. School have not been required to maintain admissions and advisement records in the past, only the permanent academic record and financial aid records (for five years).

Basic Records: The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

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Accept as written

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010

Accept as written

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0.11

Accept as written

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rhio

Accept as written

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013

DT4

Accept as written

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Accept as written

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INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 10:13:10 AM Last Modified: Saturday, October 15, 2016 10:13:52 AM

Time Spent: 00:00:42 IP Address: 99.101.42.108

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please Consultant

You are a:

a "probation order."

Page 2: Providing Feedback on Proposed Criteria

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Businet Milyand Milyand Mills

specify)

DA

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Respondent skipped tills quastion

TIE

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Res romanat akhipa d blira noredbio

DU

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Regranulant alapped this quantilon

D77

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Bongianthon skipped this

D8

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Respondent skipped tids question

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Respondent skipped this question

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Respondent alapsed this national or

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Resident skipped the question 013

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Respondent ekipped this

DITA-

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Respondent hillpact they quarties

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 10:16:36 AM Last Modified: Saturday, October 15, 2016 10:17:28 AM

Time Spent: 00:00:52 IP Address: 70.212.50.11

Page 1: Providing Feedback on Proposed Criteria

ine

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

0.3

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Businetalint skipped tills rjudstilln DA

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Respondent akipped tids quantion

ME

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Pestorobat oklapad bira porebior

DU

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Respondent skipped thisquantion

D17

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Bongandan skipped the

D/S

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Respondent akipped this question

OB

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010

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Respondent skipped this question

JON!

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Respondent slapped this named on

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Residential support the

013

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Respondent ekipped this question

D14

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Respondent his part this guestion

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 10:32:16 AM Last Modified: Saturday, October 15, 2016 10:32:25 AM

Time Spent: 00:00:08 IP Address: 104.3.116.159

Page 1: Providing Feedback on Proposed Criteria

DR Resemment skipped this

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Respondent skipped tids quantion

DIR

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Respondent aktioned their nordhor

.00

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Respondent skipped this quitalon

D7

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Bongandan skipped the

D8

Library, Instructional Resources, and Technology: The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.

Respondent akhipped this question

DE

Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level. Respondent skipped this punition

010

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Respondent skipped this question

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Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

Respondent slapped this named on

0.12

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Regionskint skipped the question 013

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this question

D14

Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

Respondent his part this guestion

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 12:13:25 PM Last Modified: Saturday, October 15, 2016 12:13:59 PM

Time Spent: 00:00:34 IP Address: 107.191.0.159

Page 1: Providing Feedback on Proposed Criteria

DR .

What is your name (First, Last)?

Other (please consultant specify)

You are a:

a "probation order."

Page 2: Providing Feedback on Proposed Criteria

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council

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Busing that skipped this muchion

DA

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Respondent skipped tills quastion

Mis

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Pestorobat oklapad bira porebior

DU

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Regranulant alapped this quantition

D77

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Boogiandam skipped this

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Respondent skipped tids question

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010

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Respondent skipped this question

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Respondent stopped this number

10/12

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Resident skipped the question

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this

DITA-

Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

Respondent his part this guestion

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 2:01:56 PM Last Modified: Saturday, October 15, 2016 2:02:15 PM

Time Spent: 00:00:19
IP Address: 98.182.33.212

Page 1: Providing Feedback on Proposed Criteria

Responsent skipped this

What is your name (First, Last)?

faculty member

You are a:

Page 2: Providing Feedback on Proposed Criteria

Bankarulani ikiyari Uru questani

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

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Respondent skipped tills quastion

Min

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Pes rorotrat aktopa d Mas governos

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Resounders skipped this quiction

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Bengandani ekityasi thia umasimi D8

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Respondent skipped tids question

OF

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010

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Respondent skipped this question

JON!

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Respondent slapped this number

Q12

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Regional et skipped the question

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Respondent ekipped this

DITA-

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 3:18:09 PM Last Modified: Saturday, October 15, 2016 3:33:48 PM

Time Spent: 00:15:39
IP Address: 70.212.33.109

Page 1: Providing Feedback on Proposed Criteria

Nu.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changed are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-case directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of showcause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a "show-cause directive" will be revised with a "probation order."

Modify (explanation needed),

Explanation In person should be available.

Accept as written

Campus Effectiveness Plan - Appendix K: The Council has proposed a series of revisions to the Campus Effectiveness Plan (CEP). The changes include the addition of "Appendix K," which will detail the guidelines and requirements for the CEP, including all evaluation elements and monitoring processes. In addition, the Council proposes adding two more important new measurements, namely, the programand campus-level graduation rate, and the institutional cohort default rate.

Accept as written

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Accept as written

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Accept as written

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Modify (explanation needed).

Explanation

Based upon being a residential or fully online program.

Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level.

Reject (explanation needed),

Explanation

This is totally dependent upon the programs. Many different fields at the nondegree credential level may have common classes. This is a decision that should be left with the campus.

Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

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Modify (explanation needed),

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Explanation

Articulation agreements and other such contracts and agreements may occur within a few months of the latest catalog being published thus do we wait and publish in the next catalog. Or are you expecting the school to update the catalog every day?

Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Explanation

There are other beneficial ways to supervise an externship other than simply qualified faculty members. It depends on the externship purpose and all involved.

DIN

Modify (explanation needed)

Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

Modify (explanation needed)

Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 6:50:04 PM Last Modified: Saturday, October 15, 2016 6:50:22 PM

Time Spent: 00:00:17 IP Address: 72.201.242.58

Page 1: Providing Feedback on Proposed Criteria

Dr.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Council Action/Probation Standard: The Council proposes

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Bassion for skipped this quasilion DA

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Respondent skipped ties question

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Pes combat skipped bles poredline

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Bonganden skipped the

D8

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Respondent skipped tills question

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010

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Respondent skipped this question

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Respondent slapped this named on

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Residential support the

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Respondent ekipped this

D14-

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Respondent hillpard they quarties

COMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 11:40:56 AM Last Modified: Saturday, October 15, 2016 7:05:42 PM

Time Spent: 07:24:46 IP Address: 24.5.132.59

Page 1: Providing Feedback on Proposed Criteria

DR Respondent skipped this

What is your name (First, Last)?

Q2 Resoundent #kh/per(this

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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1500

Accept as written

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Accept as written

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INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Saturday, October 15, 2016 7:10:01 PM Last Modified: Saturday, October 15, 2016 7:10:39 PM

Time Spent: 00:00:37 IP Address: 170.215.65.152

Page 1: Providing Feedback on Proposed Criteria

MILES 1

What is your name (First, Last)?

You are a:

Other (please indespecify) rese

independent researcher

Page 2: Providing Feedback on Proposed Criteria

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Booker land skipped Williamskiller

DA

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Respondent skipped tills quastion

TOB

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Respondent skipped this quasilon

07.

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Bongandian skipped thes uposition D8

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Respondent akhped this question

DE

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010

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Respondent skipped this question

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Respondent slapped this named on

0.12

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Resident skipped the question

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Respondent ekipped this

DITA-

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Respondent hillpard this quarties

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Sunday, October 16, 2016 9:31:24 AM Last Modified: Sunday, October 16, 2016 9:32:26 AM

Time Spent: 00:01:01 IP Address: 172.56.6.139

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

40

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Respondent skipped tids quantion

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Respondent aktiga at their governor

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Respondent skipped this quasilon

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Bengiaudom skipped thes

D8

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Respondent skipped tills question

108

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Respondent skipped this question

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Respondent slapped this number

Q12

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Residential support the

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Respondent ekipped this

DITA-

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Respondent his part this guestion

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Sunday, October 16, 2016 10:11:45 AM Last Modified: Sunday, October 16, 2016 10:14:04 AM

Time Spent: 00:02:18

IP Address: 216.201.242.126

Page 1: Providing Feedback on Proposed Criteria

Dis .

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Respondent skipped this quantion

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Bongandian skipped thes uposition D/S

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Respondent skipped tills question

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Respondent skipped this question

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Respondent ekipped this numeriou

DITA-

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Respondent his part this guestion

COMPLETE

Collector: Web Link 2 (Web Link)

Started: Monday, October 17, 2016 5:31:53 PM Last Modified: Monday, October 17, 2016 5:36:55 PM

Time Spent: 00:05:02

IP Address: 216.201.242,126

Page 1: Providing Feedback on Proposed Criteria

Dis .

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Accept as written

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Modify (explanation needed),

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Three is too many. Two is my recommendation unless the instructor has taught more than three years.

Accept as written

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DT4

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Sunday, October 30, 2016 12:02:02 PM Last Modified: Sunday, October 30, 2016 1:40:23 PM

Time Spent: 01:38:20 IP Address: 98.236.18.139

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

DÜ

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Modify (explanation needed),

Explanation

i understand that the proposed language suggests that these are guidelines for Council actions. However, the world can be more complicated than these seemingly-rigid guidelines imply. I certainly cannot anticipate all the scenarios in which the rigid language of the proposal would produce an application inconsistent with the intent of the proposal. But I think that the Council should consider explicitly identifying that it will take into consideration the impact of small cohorts and related-program results. Let me offer two examples, both of which occur in part due to small numbers and the ability to seamlessly switch between programs. #1: In most program areas, we offer a diploma option that is a subset of the associate degree program (all diploma courses transfer into the degree), and students have little pressure to choose one until the end of the diploma portion. However, they are not "stackable" in the sense that one does not automatically receive a diploma after taking all diploma courses. For example, all accounting students-diploma and degree-all start their programs together and take all courses in the first 8 months together as a cohort. For each student, there can be one of four outcomes: . The student withdraws in less than 8 months. . At the end of 8 months, some students decide to stop, receive a diploma, and enter the placement pool (because they are eager to work, do not want more debt, and/or are weaker students who may not last another 8 months). • At that 8-month point, other students decide to continue for 8 months, at the end of which 16-month program they will receive a degree-but not a diploma-and enter the placement pool. . The small number of students who make it through more than 8 months but less than 16 months are awarded a diploma at the point they withdraw (as they have met all of the diploma program requirements) and they enter the placement pool. Most of our students in many states initially enroll in the degree program so they may be eligible for state grants. However, the ability to switch so easily between the degree and diploma options can create

different distortions in one or more of the programs in any given year. Here is a typical example: We could start a group of 13-14 in the accounting degree program and none in the diploma program starting at the same time. After 8 or more months, 1-2 weaker ones could graduate with a diploma and 0-of-1 or 1-of-2 may find employment in the field. After 16 months, 10 stronger ones could graduate with a degree and all 10 may find employment in the field. The overall placement rate is over 90%, but the diploma program shows a 0% or 50% placement rate and the degree program shows a 100% placement rate. A variation of this example is if only one accounting student elects to start in the diploma program and no one else switches into it. If that student withdraws, we show 0% retention and graduation rates. #2: Most prospective students interested in working in legal environments believe they want to work as paralegals. Our long experience suggests that many do not have the academic ability and/or preparation to become employable paralegals, but they do have the ability to become very functional legal administrative assistants. Thus, before we accept students interested in the 16month paralegal degree program, we administer a placement test. If prospective students do not perform well enough on that placement test, we accept them into their second choice, which is essentially always the 16-month legal administrative degree program. The 10-month legal secretarial diploma program usually doesn't attract too many students at the start. We tell these students that the first six months of all three programs are identical and they all will take those courses as a single cohort; if, through six months, legal administrative students demonstrate strong academic performance and/or paralegal students demonstrate weak academic performance, we allow or encourage students to switch between the two programs. What can result sometimes is a perfect storm for attrition in the legal administrative degree program. First, the weaker students originally were in that program, so there may already have been some attrition. Second, the portion of the legal administrative students who hoped to move into Paralegal but were unsuccessful may be disappointed, which can lead to attrition. Third, any students who performed so poorly that they were moved from paralegal to legal administrative in our hopes to get them through a program often can be embarrassed or disappointed; that also can lead to attrition. As a result, overall retention/graduation rates for the three related programs in this area often can be quite acceptable, but the paralegal degree retention/graduation rate can appear high and the legal administrative degree retention/graduation rate can appear low.

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Accept as written

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08

Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level. Modify (explanation needed),

Explanation

The world can be more complicated than this rigid number of three implies. I fear that the rigid number and the implied definition of "different fields" may allow an over-zealous member of a visiting team to over-apply a non-flexible requirement. I certainly cannot anticipate all the scenarios in which the rigid language of the proposal would produce an application inconsistent with the intent of the proposal. For example, a faculty member may teach two courses to a cohort of students, one of which is primarily lecture and the other of which is basically a lab applying that information. If a faculty member feels the lab requires even 5 minutes of preparation, does that count? As another example, many courses may be a mixture of lecture and laboratory, as defined in the Glossary. Together, their two preparations may amount to far less than one of the kinds of preparations seemingly implied by the proposal. Does that have to count as two preparations? Maybe NACIQI has directly stated that the standard must be three preps; however, I doubt that regionals would accept that rigidity. I think that it would be more appropriate to use language like "reasonable" rather than "three" for the number of preparations.

010

Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

Accept as written

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Accept as written

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D13

Dire

Accept as written

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Monday, October 31, 2016 11:32:16 AM Last Modified: Monday, October 31, 2016 11:45:55 AM

Time Spent: 00:13:38 IP Address: 46.5.0.95

Page 1: Providing Feedback on Proposed Criteria

be

What is your name (First, Last)?

1)2

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

Dil

Accept as written

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D8

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013

DT4

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COMPLETE

Collector: Web Link 2 (Web Link)

Started: Friday, November 04, 2016 11:59:39 AM Last Modified: Friday, November 04, 2016 12:37:14 PM

Time Spent: 00:37:35 IP Address: 12.192.39.226

Page 1: Providing Feedback on Proposed Criteria

Di.

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Reject (explanation needed),

Explanation

i. INTRODUCTION On September 16, 2016, ACICS issued a Memorandum to the Field proposing to make certain changes to its Accreditation Criteria. Among the changes proposed are the following: . Elimination of the directive to show cause and replacement with probation. • Permitting ACICS to take "immediate adverse action" (withdrawal by suspension or termination of a program) without a hearing prior to the action. . Application of the new provisions retroactive to the 2013 reporting year. Serious problems exist with these proposed provisions as explained in detail below. II. ANALYSIS A. As Proposed, ACICS Would Be Able to Take Adverse Action Against an Institution Without Required Due Process The proposed new language appears to permit ACICS to take immediate adverse action against an institution without the benefit of notice to the institution and an opportunity for the institution to respond before taking such action against an institution in violation of federal recognition regulations. As an accrediting agency recognized by ED to be a "reliable authority as to the quality of education or training offered for the purposes of [Title IV]," ACICS is subject to federal law that compels it to establish and apply review procedures that "comply with due process." 20 U.S.C. § 1099b(a)(6). ED has detailed directly in 34 C.F.R. § 602.25 what those procedures require to comport with due process but other regulations also address due process requirements. See, e.g., 34 C.F.R. §§ 602.18, 602.20, & 602.23. These regulations require that accrediting agencies ensure consistency in decision-making, progressive compliance procedures, and publication of the standards and procedures it uses to determine whether to take any adverse action regarding accreditation. Id. ACICS's Bylaws and Criteria reflect these federal requirements and specifically require the Council to "provide mechanisms for appeals and dispute resolution to ensure due process in resolution of conflicts between members and the Council." ACICS Bylaws, Article III, Section 2(d). The Bylaws, moreover, require that all Criteria that Council

Tripewarung ewiginin between we weekens between weightigen promulgates "ensure that institutions are provided a fair and reasonable opportunity to present reasons why denial, suspension, withdrawal, or other final actions taken by the Council are inappropriate and should be remanded for further consideration." Article VII, Section 2. These Bylaws, undoubtedly, stem from federal recognition regulations, which dictate the process accrediting agencies must provide to its member institutions prior to taking adverse action against them. An "adverse action" includes, but is not limited to the denial, withdrawal, suspension, revocation, or termination of accrediting action "or any comparable accrediting action an agency may take against an institution or program." 34 C.F.R. § 602.3. Federal recognition regulations require that before ACICS takes any adverse action against an institution it must 1) notify the institution of any deficiencies it has identified; and 2) give the institution an opportunity to respond in writing to the alleged deficiencies within a designated timeframe. The relevant regulation reads: The agency must demonstrate that the procedures it uses throughout the accrediting process satisfy due process. The agency meets this requirement if the agency does the following: *** (d) Provides sufficient opportunity for a written response by an institution or program regarding any deficiencies identified by the agency, to be considered by the agency within a timeframe determined by the agency, and before any adverse action is taken. (e) Notifies the institution or program in writing of any adverse accrediting action or an action to place the institution or program on probation or show cause. The notice describes the basis for the action. (f) Provides an opportunity, upon written request of an institution or program, for the institution or program to appeal any adverse action prior to the action becoming final, 34 C.F.R. § 602.25(d)-(f) (emphasis added). However, ACICS appears to be proposing in Appendix L to permit it to take adverse action against an institution that does not meet certain student achievement rates before giving institutions the notice and opportunity to respond required by 34 C.F.R. § 602.25. Specifically, Appendix L states that current CAR submissions of institutions that show student achievement rates below 50% will be subject to probation or an "adverse action." The following year, the proposed Appendix L would make all institutions with achievement rates below 50% subject to adverse action without the probation option. While the Appendix refers to the right for institutions to appeal adverse decisions to a Review Board, nothing in the proposed language states that these institutions would be provided with prior notice and a hearing under Criteria § 2-3-500. Plainly stated, if ACICS suggests that it may deny, withdraw,

suspend, revoke, or terminate an institution's accreditation or take comparable action because of student achievement rates not meeting a certain threshold, it will be in direct violation of 34 C.F.R. § 602.25(d). While 34 C.F.R. § 602.20(a)(1) permits an institution to "immediately initiate" an adverse action against an institution, the provision does not give ACICS license to immediately take adverse action against an institution. This distinction is critical. Section 602.25(d) unequivocally requires agencies to provide institutions with a right to respond to allegations about deficiencies before an adverse action is "taken;" but section 602.20(a)(1) permits an agency only to immediately "initiate" an adverse action, which would necessarily include providing an institution with both prior notice and an opportunity to respond before such action is actually "taken." For these reasons, CSI respectfully recommends that ACICS change its proposed Appendix L only to permit the initiation of adverse action against an institution not meeting certain student achievement rates, but not to take such action until ACICS provides the institution with an opportunity to respond and be afforded a hearing pursuant to Criteria § 2-3-500. B. The Proposed Criteria Changes Would Permit ACICS to Impose Penalties to Institutions Retroactively and in Contradiction of Due Process and Contractual Rights of Institutions The new Student Achievement standards in proposed Appendix L would become effective for the 2013 reporting year. September 16, 2016 at 17. Data submitted for the 2013 reporting year was submitted by institutions in 2014 -- 2 years ago. Accordingly, ACICS proposes to subject institutions to standards for past years' performance when they had no way of predicting these substantial changes. This reach-back application is fundamentally unfair because it imposes a condition upon institutions of which it had no notice and, thus, is impermissibly retroactive. Courts have considered when a provision is retroactive in effect. For example, the U.S. Supreme Court has stated that in cases where a provision "impair rights a party possessed when he acted, increase a party's liability for past conduct, or impose new duties with respect to transactions already completed," the provision is impermissibly retroactive. See Landgraf v. USI Film Prods., 511 U.S. 244, 280 (1994). In this case, it is clear that institutions could be subjected to adverse action impairing their right to accreditation for rates that were calculated for years in the past. Under these circumstances, ACICS should make any changes to the student achievement thresholds not effective until the 2016-17 reporting year. III. CONCLUSION For all of the reasons stated above, CSI respectfully encourages ACICS to change Appendix L to make it clear that institutions will have the right to a

Section 2-3-500 hearing before any adverse action is taken against those not meeting student achievement thresholds and that the changes will not be effective until the 2016-17 reporting year. Footnotes: 1 In turn, this regulation stems from statute that requires agencies to have review procedures that "comply with due process" including providing institutions: (B) for sufficient opportunity for a written response, by an institution or program, regarding any deficiencies identified by the agency or association to be considered by the agency or association -- (i) within a timeframe determined by the agency or association; and (ii) prior to final action in the evaluation and withdrawal proceedings; 20 U.S.C. § 1099b(a)(6)(B). 2 It is not clear whether the student achievement rates referenced in Appendix L refer to aggregate achievement rates or something else. 3 There is some confusion about when these changes to Appendix L would become effective. While the memorandum refers to the 2013 reporting year on page 17, on page 14 the memorandum states that it would be applied to the data submitted in the 2016 CAR. Either way, ACICS would be applying new thresholds and consequences retroactively, i.e., for past performance.

106

Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

Respondent skipped this business

127

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Respondent sklyped time

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Respondent skipped this question

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010

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Respondent skipped this question

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Respondent slapped this number

10/12

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Responsibility and production

013

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INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Thursday, November 17, 2016 2:03:26 AM Last Modified: Thursday, November 17, 2016 2:32:47 AM

Time Spent: 00:29:21 IP Address: 64.80.120.194

Page 1: Providing Feedback on Proposed Criteria

Respondent skipped this

question

What is your name (First, Last)?

campus administrator

You are a:

Page 2: Providing Feedback on Proposed Criteria

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Respondent skipped this

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Respondent skipped tills gunstion

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Respondent aking at they quarkless

INCOMPLETE

Collector: Web Link 2 (Web Link)

Started: Monday, November 28, 2016 11:03:26 PM Last Modified: Monday, November 28, 2016 11:04:30 PM

Time Spent: 00:01:03 IP Address: 96.94.18.187

Page 1: Providing Feedback on Proposed Criteria

What is your name (First, Last)?

Other (please specify)

You are a:

Page 2: Providing Feedback on Proposed Criteria

DÜ

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COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, May 10, 2017 2:03:18 PM Last Modified: Wednesday, May 10, 2017 2:36:08 PM

Time Spent: 00:32:49
IP Address: 98.168.242.88

Page 1: Providing Feedback on Proposed Criteria

101

What is your name (First, Last)?

122

You are a:

Other (please specify)

Active ACICS member for 26 years and Schools

Resource Consultant

Page 2: Providing Feedback on Proposed Criteria

DCI

A. Intent to Bar/Debarment Appeal: The Council proposes to clarify the language surrounding the debarment appeal process. The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar. The Criteria on debarment could be interpreted that an individual or entity may elect to appeal the debarment action. The revised language intends to remove this possible interpretation.

Accept as written,

Explanation

Debarment is the most severe negative action which could be administered. I personally was part of a debarment action and am aware of its ramifications. I support any clarification to better amplify the actions being administered.

04

B. Review Board Members and Expenses of an Appeal: The Council proposes to clarify language regarding the Review Board of Appeals members. The proposed language indicates that a panel of three persons will be selected from a pool of 15 members of the Review Board of Appeals. The order of the types of members has also been reorganized for consistency. In addition, the proposed language requires a remittance of a standard hearing fee.

Accept as written,

Explanation

Fees for any school should be clarified within a range. Budgeting for the fees allows schools to plan for possible expenses.

05

C. Institutional Grant Length: The Council proposes to reinstitute the determination of grant length at the institutional level rather than at the campus level. The proposal would require each branch campus to have the same grant length as its main campus.

Accept as written,

Explanation

I believe this was the original intent when schools were held to the deferral of one school/campus includes all associated campus members.

DG

D. Unannounced Visit Fees: The Council proposes that the Criteria related to charges for unannounced visits be consistent with fees assessed for scheduled visits. Therefore, the proposed change is that unannounced visits also be assessed a fee. Failure to pay the fee would be subject to adverse action.

Modify (explanation needed),

Explanation

Fees are dependent on travel, lodging, honorariums and food. Fees should exceed a reasonable level.

D7.

E. Council Hearing Procedures: At its December 2016 meeting, the Council moved to require all show-cause hearings to be in writing unless an in-person hearing is desired by the Council. The proposed changes in the Criteria reflect this decision with the change of "in-writing hearing" to "institutional review." For institutional reviews, the submission of materials and fee would replace a notification of acceptance as confirmation of the understanding of its show-cause status, and institutions are able to submit evidence already considered. The proposed changes also include procedures for when the Council requires a hearing in person.

Modify (explanation needed),

Explanation

How does this satisfy due process if a campus request a hearing?

Q8

Accept as written

F. Revision of Change of Ownership/Control Action: The Council proposes a revision to the title of the Criteria regarding denial of renewal of accreditation to reflect the contents of the criterion. The title clarifies the denial of renewal of accreditation after change of ownership or control.

D9

Accept as written

G. Institutional Show-Cause & Withdrawal of Approval: The Council proposes to clarify language regarding show-cause concerning a branch campus. The revised language indicates that a show-cause action may result in the withdrawal of approval of a branch campus rather than the withdrawal of accreditation.

757O

Accept as written

H. Revocation for Failure to Respond to Show-Cause Directive: The Council proposes language in the Criteria which will outline possible consequential actions taken when an institution does not respond to a show-cause directive. The language also allows for withdrawal actions to also be taken at the campus level.

DITT

I. Student Achievement Procedures: The Council proposes changes in the Criteria to reflect recent changes in standards and guidelines regarding student achievement. The proposed language will be consistent with other Council actions and provide clarity on its expectations with each action. In addition, two sections of the Criteria have been revised for efficiency and a revision was made to procedural guarantees for withdrawals by suspension.

Explanation

Student achievement varies demographically across the United States. We have always got ourselves into achievement reporting issues when comparisons are made for schools and communities with different student body demographics. Student achievement should be measured on agreed upon competencies by career milestones throughout the educational experience. All syllabi should represent these competencies. Outcome based education reveals program and school success with retention, pass-fail and student attendance.

Q32

Accept as written

J. Distance Education Approval: The Council seeks to clarify the language regarding distance education or other new instructional delivery methods.

Accept as written

K. Denial Actions Not Affecting Overall Accreditation: The Council proposes that institutions may respond to denial actions, including those based on substantive changes.

Accept as written

L. Substantive and Non-Substantive Changes: The Council proposes to add a 25 percent decrease change to a program's clock or credit hours to the list of substantive changes. The revised wording would include a 25 percent or greater change (to include increase and decrease). In addition, the Council proposes that campuses must notify ACICS of non-substantive changes prior to implementation and notify ACICS when a change has not been implemented within a year.

.015

Accept as written

M. Renewal of Accreditation Application Submission: The Council proposes to allow campuses to submit all renewal applications and fees two to three months before the start of the campus's assigned review cycle rather than September 30th prior to the renewal year. Information submitted closer to the visit would give ACICS a more accurate picture of the campus. In addition, Council proposes that once self-study materials are submitted, substantive changes would not be allowed before the visit.

127.6

Accept as written

N. Advertising - Third Party Services: The Council proposes to eliminate one element of Appendix C regarding disclosure of third party services.

O. Integrity: The Council proposes to revise the language for the criterion regarding integrity of an institution to include capability of management.

P. Classification of "Centrally Controlled Institutions" and "Distributed Enterprise": The Council proposes to provide consistency within the Criteria regarding "Centrally Controlled Institutions" and "Distributed Enterprises." The revision of all instances of these terms will provide a consistency in terminology related to classifications of institutions.

Explanation

I don't disagree with the concept of this intention. Remember that with large multi-campus organizations (publicly traded) will have an existence of management at the corporate level and campus. Sometimes the capability at the campus level may be sufficient but the corporate level has a negative influence on their functional ability to comply. I am aware of many great schools operating in the shadow of potential management at a corporate level which has negative compliance potential. Does this criteria take into account all lines of authority and management?

Explanation

For classification purposes I agree, don't forget the influence the corporate executives authority they have outside of the institutional classification.

INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, May 10, 2017 11:53:52 PM Last Modified: Wednesday, May 10, 2017 11:54:22 PM

Time Spent: 00:00:29
IP Address: 68.205.10.62

Page 1: Providing Feedback on Proposed Criteria

DS

What is your name (First, Last)?

4.0

student

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

A. Intent to Bar/Debarment Appeal: The Council proposes to clarify the language surrounding the debarment appeal process. The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar. The Criteria on debarment could be interpreted that an individual or entity may elect to appeal the debarment action. The revised language intends to remove this possible interpretation.

Bassion that skipped this must be

DA

B. Review Board Members and Expenses of an Appeal: The Council proposes to clarify language regarding the Review Board of Appeals members. The proposed language indicates that a panel of three persons will be selected from a pool of 15 members of the Review Board of Appeals. The order of the types of members has also been reorganized for consistency. In addition, the proposed language requires a remittance of a standard hearing fee.

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.05

C. Institutional Grant Length: The Council proposes to reinstitute the determination of grant length at the institutional level rather than at the campus level. The proposal would require each branch campus to have the same grant length as its main campus.

Respondent seinpectitus

DE

D. Unannounced Visit Fees: The Council proposes that the Criteria related to charges for unannounced visits be consistent with fees assessed for scheduled visits. Therefore, the proposed change is that unannounced visits also be assessed a fee. Failure to pay the fee would be subject to adverse action.

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D77

E. Council Hearing Procedures: At its December 2016 meeting, the Council moved to require all show-cause hearings to be in writing unless an in-person hearing is desired by the Council. The proposed changes in the Criteria reflect this decision with the change of "in-writing hearing" to "institutional review." For institutional reviews, the submission of materials and fee would replace a notification of acceptance as confirmation of the understanding of its show-cause status, and institutions are able to submit evidence already considered. The proposed changes also include procedures for when the Council requires a hearing in person.

Respondent skipped this upostion

08

F. Revision of Change of Ownership/Control Action: The Council proposes a revision to the title of the Criteria regarding denial of renewal of accreditation to reflect the contents of the criterion. The title clarifies the denial of renewal of accreditation after change of ownership or control.

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D9

G. Institutional Show-Cause & Withdrawal of Approval: The Council proposes to clarify language regarding show-cause concerning a branch campus. The revised language indicates that a show-cause action may result in the withdrawal of approval of a branch campus rather than the withdrawal of accreditation.

Has poroton skipped the

010

H. Revocation for Failure to Respond to Show-Cause Directive: The Council proposes language in the Criteria which will outline possible consequential actions taken when an institution does not respond to a show-cause directive. The language also allows for withdrawal actions to also be taken at the campus level.

Bayloroteni skipped tine question DTI

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Respondent skipped this question

10/19

J. Distance Education Approval: The Council seeks to clarify the language regarding distance education or other new instructional delivery methods.

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KRO

K. Denial Actions Not Affecting Overall Accreditation: The Council proposes that institutions may respond to denial actions, including those based on substantive changes.

Respondent skipped their punction

3354

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DIE S

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Respondent skipped this number

DW

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Respondent skipped this question

DIB

Respondent ekipped this upestion

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INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, May 15, 2017 8:09:22 PM Last Modified: Monday, May 15, 2017 8:09:45 PM

Time Spent: 00:00:22 IP Address: 50.135.66.148

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

student

You are a:

Page 2: Providing Feedback on Proposed Criteria

03

A. Intent to Bar/Debarment Appeal: The Council proposes to clarify the language surrounding the debarment appeal process. The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar. The Criteria on debarment could be interpreted that an individual or entity may elect to appeal the debarment action. The revised language intends to remove this possible interpretation.

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150

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Respondent skipped this upostion

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DR

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Responsive skipped time question DTI

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Respondent skipped this question

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Respondent exipped the question

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Respondent skipped their punction

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D1/5

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Respondent skipped this quantities

DIE S

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INCOMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, May 16, 2017 9:50:19 PM Last Modified: Tuesday, May 16, 2017 9:50:49 PM

Time Spent: 00:00:30 IP Address: 50.131.164.207

Page 1: Providing Feedback on Proposed Criteria

DR

What is your name (First, Last)?

172

student

You are a:

Page 2: Providing Feedback on Proposed Criteria

DG

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DH/s

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